
YMCA Geelong – Privacy Policy

OFFICE USE ONLY

Policy Number	Date Approved	Date Last Amended	Status
YG-126-G	25/02/2026	27/01/2026	APPROVED

1. INTRODUCTION

The Y Geelong is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>.

2. PRIVACY POLICY STATEMENT

The Y acknowledges and respects the privacy of its staff. The personal and health information being collected by YMCA Geelong Inc. and its entities are for the purposes of processing membership, enrolments, bookings, employment (payroll, superannuation, taxation, employment records, workover, human resources statistical purposes, staff communication, incident reporting and disclosure to external agencies for the compliance to YMCA Australia, Y Safeguarding, Gymnastics Australia, Basketball Australia, Judo, Netball, ACECQA (Children's Services) and any other licensing standards or affiliated bodies, statutory authorities or government agencies - for the purpose of adhering to child safety standards, critical or major incident reporting requirements, reportable conduct,) relating to employment activities at Y Geelong Inc. operations.

By joining the Y as a participant or employee you have consented to this information to be collected, used and disclosed for the purposes it is intended. The intended recipients of this information are listed above, it's authorised staff and contracted service providers such as financial institutions and Government agencies cover by law. You have the right to access and alter personal and health information concerning yourself in accordance with the Privacy Act 1988 (amended 2021) and YMCA Geelong Inc. Privacy Policy.

3. POLICY

The Y reserves the right to make changes or amendments to the **YMCA Geelong Privacy Policy** as required by law.

3.1 Collection, use and disclosure of information

3.1.1 Collection of personal or health information

The Y collects personal information directly from our clients, members, third party agencies, referral agencies, participant representatives/guardians/carers/ support agencies, staff, volunteers and visitors through electronic, verbal, and written correspondence by means of email, phone, online, in person, via competitions, enrolments, social media.

Data collected includes but is not limited to;

Phone numbers, emails, addresses, date of birth, gender, medical conditions, medication plans, risk and behaviour management plans, payment details, bank account details, concession card details, Family Assistance Officer CRN, Court Order information and emergency contact details.

You agree as a condition of your participating in a Y service or program or employment/volunteerism with Y Geelong that where you are involved in or connected with a Safeguarding Concern, the Y Geelong may collect and share your Personal Information with other Y organisations (including, but not limited to, Y Australia and Y Safeguarding) and third parties (including but not limited to the Investigators or assurance providers) and entities that must be informed by law, such as government / regulatory authorities or the police). Where those disclosures occur, you also consent to the receipt of your Personal Information by these entities.

3.1.2 For the purposes of this clause, “involved in or connected with” a Safeguarding Concern means that you are suspected of, or have committed, any act or omission that is the subject of a Safeguarding Concern, or you are connected with a Safeguarding Concern in any other way, such as where you are a witness to an alleged abuse, or a child / young person has disclosed to you an allegation of abuse.

3.1.3 In order for Y Geelong to be able to share your Personal Information in future, you agree that Y Geelong may retain your Personal Information indefinitely, and that this condition will also apply indefinitely, beyond the end of your employment. Subject to the above, your Personal Information will be managed and protected in accordance with the Australian Privacy Principles to the extent required.

3.2 Use of personal or health information

The YMCA may use personal/health information for:

- programs and service provision
- administration
- training
- payroll
- research and development purposes

- reporting to regulatory authorities
- Investigation
- Or other related services associated with maintaining membership or participation.

Personal Information has the meaning set out in the Privacy Act and includes sensitive information within the meaning of the Privacy Act. This includes your name, contact details and any other information about you;

- **Privacy Act** means the *Privacy Act 1988*, as amended from time to time;
- **Safeguarding Concern /Child Safety and Well-being Concerns** means any concern relating to the welfare and safety of a child or young person;
- **Y Australia** means Young Men's Christian Associations of Australia t/a YMCA Australia (ABN 45 004 076 297); and
- **Y Safeguarding** Means Y Safeguarding Ltd. (ABN 41 649 178 165).

3.3 Collection of personal or health information relating to children

The Y does not collect, use or disclose personal information about anyone under the age of 18 unless we have the consent of a parent or legal guardian.

The Privacy Act extends rights to individuals of any age and does not specify an age at which an individual is capable of giving consent. Under common law, considerations of what an appropriate age is, take into account factors like the maturity of the child and the child's ability.

3.4 Disclosure of personal or health information

The Y may disclose personal & health information to organisations/individuals outside the Y in order to provide the range of services and programs offered. The consent of the individual will be sought prior to any disclosure of personal or health information.

Disclosure of personal and health information will be in accordance with the National Privacy Principles.

3.5 Data Quality

The Y takes reasonable steps to ensure that personal information is accurate, complete and up to date whenever it is collected, used or disclosed. We require customers to annually update their enrolment information and Employees to ensure that their personal information is accurate and update via our secure systems.

3.6 Data Security, Storage & Retention

The Y takes reasonable steps to protect personal information from loss, misuse, unauthorised disclosure or destruction.

Only authorised Y staff, volunteers, or sub-contractors have access to information for approved purposes.

Data is stored in third party secure hosted data centres and comply with data security standards. Annually these suppliers are asked to provide a compliance report and to validate our audit requirements.

Health information will be retained for a minimum of 7 years following the last occasion on which service was provided. Where information was collected while the individual was a child it shall be retained until the individual is 25 years old, or for 7 years whichever is the greater.

3.7 Openness

The Y Privacy Policy is available to:

- The community, members and clients through external promotional material brochures and websites.
- staff and volunteers employee portals and through induction processes,

3.8 Access and Correction

Access to personal information collected and stored by the YMCA will be administered according to the provisions of the Commonwealth Privacy Legislation.

The Y requires any person requesting access to their individual's personal information put their request in writing/email and attention to the CEO and forward to geelong@ymca.org.au. All requests are processed within 30 days of receipt of application at no charge. Access to personal/health information for the purposes of viewing or correction will only be available to people requesting changes to their specific information or authorised carers/guardians with the consent of the person requesting the information.

Annually all members/customers will be required to provide an updated enrolment/registration/booking form to ensure that personal and health information is accurate.

In accordance with the Health Records Act, all Health information collected by the Y will not be deleted. Amendments or alterations to the health information will be recorded on a separate form and attached to the original file.

3.9 Unique Identifiers

The Y may be required to collect an individual's identifier such as Tax File number, Medicare number or Social Security number for the provision of services. These identifiers will only be disclosed to agencies as required by law.

3.10 Anonymity

Wherever it is lawful and reasonable to do so, the Y provides an opportunity to remain anonymous.

3.11 Transferred data flows

The Y does not transfer any personal/ health information overseas without the consent of the individual however some software may be accessed on secure platforms based overseas.

As required by law and regulations the Y maybe required to transfer individual's personal information to statutory authorities that regulate sectors that the Y delivers services.

Effective 27/02/2026 the Y is required to provide Australian Children's Education & Care Quality Authority (ACECQA) the following information of all education and care service workers including:

- educators
- volunteers
- students
- non-educator staff
- teachers (regardless of whether they are registered or accredited with a teacher registration body)
- nominated supervisors
- coordinators and
- FDC educator assistants

The following personal information;

- identity (name, date of birth, any alias and/or former names)
- contact information (address, telephone number and email)
- role at the service
- date of commencement / date of employment cessation
- service approval number of the service they are engaged with
- if they are employed directly or indirectly (e.g. through a recruitment agency or labour hire) at the service
- if they are employed on a three-month probationary basis (for centre-based services only) (not applicable in NSW)
- relevant qualifications held (and if applicable, that the staff member is 'actively working towards' that qualification, or is counted in ratios by virtue of a probationary period)
- evidence of having completed the following training and qualifications including:
 - required child protection training, and the expiry date (if applicable)
 - required child safety training, and the expiry date (if applicable)
 - approved first aid qualification
 - approved anaphylaxis management training
 - approved emergency asthma management training.
- current Working with Children Check (WWCC) or Vulnerable People Check (WWVP) (or state equivalent) identifying number and expiry date OR teacher registration number and expiry date (if applicable).

3.12 Sensitive information

The Y collects sensitive information such as religion, gender, disability, custody records, concession card details and criminal records where:

- the individual has consented; or
- the collection is required by law;

The Y does not disclose this information without consent or as required by law.

This information is recorded in secure, password protected and lockable facilities.

3.13 Transfer/Closure of Health Service

In the event of a Y managed health service (i.e. medical suite, massage service, physiotherapy service, sports medicine service, health and fitness club, recreation centre) being transferred, sold, leased, or ceasing operation; the Y will enact appropriate notification and transfer procedures as directed by the Health Records Act.

3.14 Info to another Health Service Provider

If requested by an individual the YMCA shall transfer their health information to a designated/ recognised health provider (i.e. medical suite, massage service, physiotherapy service, sports medicine service, health and fitness club, recreation centre, medical practitioners) free of charge on the completion of a "Personal Health Information Transfer Form".

The transfer of health information will be completed within 14 working days.

3.15 Consent

By acquiring, booking or using the Y services, products or facilities, individuals consent to the reasonable collection, use and disclosure of personal information.

Consent may be directly implied in the completion of an application, membership or registration form or indirectly implied. e.g. Y requests personal details to forward program information and the customers supplies their name and address for this purpose, social media, online competitions etc.

3.16 Complaints Procedure

Formal complaints regarding the manner in which personal information is collected, used, or disclosed are to be handled in accordance to the "YMCA Complaints Handling Procedures".

3.17 YMCA websites

The Y collects personal or sensitive information through websites, e-commerce systems, cookies etc. The Y protects web sites through the use of encryption technology.

3.18 Credit Card Processing

Y collects credit card details for the purpose of processing payments.

Data is immediately entered into the EFTPOS terminal at the time of payment and not recorded, or it is provided with on a booking form, processed and shredded.

3.19 Direct debit Processing

Y processes customers direct debit payments with the written authorisation of the customer on a Direct Debit Authorisation Form. Personal and sensitive information is collected, input in to Point of Sale system and payment is processed by a third payment identified on the DDR Form.

Forms are retained in a secure location for the duration of the customer's membership with the Y.

3.20 Access to the Policy

The YMCA Privacy Policy is available on YMCA Geelong website and may be updated at any time without notice.

A copy of the Policy or alternate formats of the policy can be made available on request
geelong@ymca.org.au

3.21 Notification of Data Breaches

Notifications to the Office of Australian Information Commission (OAIC) is required for incidents of unauthorised access to, or disclosure or personal information; breaches of a secure storage and handling of information; or accidental loss of data such as personal details and credit information. Refer to the following documents on the OAIC website.

- [Data breach notification — a guide to handling personal information security](#)
- [Guide to developing a data breach response plan](#)
- [Guide to securing personal information](#)

4. DEFINITIONS

'Privacy' means many different things to people.

It can mean protecting your personal space by not having others observe you when you are at home or in your backyard. It may be expecting not to be subject to video surveillance when you are at work. Central to all ideas of 'privacy' is keeping your own actions, conversations, information and movements free from public knowledge and attention.

What privacy means as a general concept is often different to what privacy means under law. Only certain types of information and activities are protected by privacy legislation.

Data protection laws

Most privacy laws are more correctly described as data protection laws, as they are limited to regulating the handling of personal information by organisations

4 SCOPE

This policy applies to all employees, volunteers and contractors of YMCA Geelong Inc. and associated clubs.

5 ROLES AND RESPONSIBILITIES

Department/Area	Role/Responsibility
CEO	CEO is responsible for the development, monitoring and review of the Policy and related systems. Responding to complaints and reporting
Board	Ensuring suitable resources and support systems to enable compliance with this policy.
Senior Management	Responsible for: <ul style="list-style-type: none">• the promotion of a culture that encourages respect and consideration for the privacy and use of people's private information is lawful.

	<ul style="list-style-type: none">• Adhering to the requirements of the Privacy Policy
All employees (including Managers, Directors, Coordinators, Team Leaders), Volunteers and Contractors	Responsible for adhering to the requirements of the Privacy Policy and attend training to ensure they understand their responsibilities.

6 MONITORING, EVALUATION AND REVIEW

Adherence to this policy will be monitored through YMCA's Internal Compliance System procedures. The Incident Reporting system shall record any breaches or complaints received where the privacy of employees, volunteers, contractors or participants has been compromised.

Review of this policy will be undertaken in accordance with the requirements of the policy framework and will be reviewed every three years in consultation with the Board and other stakeholders.

Reporting of incidents of breaches of the Privacy Policy or legal requirement will be presented to the CEO and General Counsel and presented to the Board in the CEO report.

7 SUPPORTING DOCUMENTS (LINKS TO PROCEDURES, LEGISLATION, FORMS, WORK PRACTICES)

Privacy rights in Victoria are established in four pieces of privacy and privacy related legislation:

Education and Care Services National Law Act 2010 and Regulations 2011

The Information Privacy Act 2000 (Vic)

The Health Records Act 2001 (Vic)

The Charter of Human Rights and Responsibilities Act 2006 (Vic).

<http://www.privacy.vic.gov.au/>

<http://www.privacy.gov.au>

Office of the Australian Information Commissioner: www.oaic.gov.au

Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Privacy Amendment Act)

Privacy Amendment (Notifiable Data Breaches) Bill 2016 (pending Gazette 2017)

YG 183-O- Document Development, Archiving, Destructions and Access Policy

Approved by: **YMCA Geelong Board**

Meeting number and date: **25/02/2026**

Effective date: **25/02/2026**

Review date: **25/02/2029**

Policy Owner: CEO

Contact Details policy owner: Ph: 5223 2714 E: geelong@ymca.org.au

Amendment history:

Version	Date	Author	Change Description
V1	11/02/2014	Shona Eland	Uploaded to YMCA Geelong Policy Template included scope, monitoring and evaluation clauses.
V2	27/05/2014	Shona Eland	Included Clauses 2.15, 2.16 , 2.17 Changed Clauses 2.1, 2.2,2.8,2.9, 2.12 updated to reference Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Privacy Amendment Act) which made many significant changes to the Privacy Act 1988 (Privacy Act). These changes commenced on 12 March 2014.
V3	20/03/2017	Rebecca Johnson	Added Clause 2.18 Notification of Data Breaches Updated section 7. Supporting Documents to include Privacy Amendment
V4	07/05/2018	Shona Eland	Added Clause 7- YG 183-O- Document Development, Archiving, Destructions and Access Policy
V5	07/03/2019	Brenda Bowell	Updated next review date from 27/05/2017 to 07/05/2021
V6	26/05/2020	Shona Eland	Inserted Clause 2.1 e- COVID-19 Requirement for personal data collection
V7	27/01/2026	Shona Eland	Clause 3.6 updated “ Employees to ensure that their personal information is accurate and update via our secure systems.’ 3.6 staff and volunteers employee portals and through induction processes 3.11 Transferred data flows The Y does not transfer any personal/ health information overseas without the consent of the individual however some software may be accessed on secure platforms based overseas. Added Effective 27/02/2026 the Y is required to provide Australian

			Children's Education & Care Quality Authority (ACECQA) the following information of all education and care service workers and list of personal information that will be transferred to ACECQA.
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As adopted by the YMCA of Geelong on xx/xx/ 2026



Shona Eland
Chief Executive Officer YMCA Geelong Inc.