



AFPA

Australian Federal
Police Association

AFPA PRIVACY POLICY

Document Summary

Document Prepared By:

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Document Authorised By:

AFPA National Executive

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AFPA Privacy Policy

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The *Privacy Act 1988* requires entities bound by the Australian Privacy Principles to have a privacy policy. This privacy policy outlines the personal information handling practices of the Australian Federal Police Association (AFPA).

Overview

The AFPA, a branch of the Police Federation of Australia (PFA), is the registered organisation representing all employees of the Australian Federal Police and Commonwealth law enforcement employees. The AFPA collects personal information to conduct its business of representing the personal and professional interests of its members. The AFPA operates in political, legal, industrial and social environments.

The AFPA is committed to protecting members' privacy and providing members with information and services relevant to members professional, employment, welfare and lifestyle related interests. The AFPA complies with the *Privacy Act 1988* (Cth) (Privacy Act) and the Australian Privacy Principles (APPs) contained within that Act. This Privacy Policy (Policy) should be read in conjunction with the Privacy Act and the APPs.

In this Policy, AFPA means:

Australian Federal Police Association ABN 95 799 543 741

How this Policy applies

This Policy applies to personal information the AFPA collects from members:

- via our websites;
- via social media;
- via telephone;
- via email or other electronic means;
- in person; and/or
- in writing.

This Policy also applies to personal information the Association collects from any third party about you.

AFPA Websites

The AFPA 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.

No attempt will be made to identify users or their browsing activities except, in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect the internet service provider's logs.

Another way information may be collected is through the use of "cookies". A cookie is a small text file that the 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.

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.

Our website may contain links to other websites and social media pages including Facebook. We are not responsible for the privacy policies of the entities who administer those websites and we recommend that you review the privacy policies applicable to any other websites you visit.

The AFPA retains a membership data base within its dynamic case management system. All details supplied by members, relevant work-related information and details of member interactions with the AFPA are recorded within the data base and case management system.

The AFPA member database and case management system is supplied by Boo Media Pty. Ltd. to agreed specifications and conforms to Australian Standards of online information security and Australian Standards of Complaints handling and Customer Satisfaction.

The kinds of information the AFPA may collect

From time to time you may voluntarily supply your personal information to the AFPA. The AFPA will record your e-mail address if you send us a message, subscribe to an email newsletter, or complete a form if this information is requested.

When you provide your personal information, it allows us, for example, to assist you with industrial relations and employment queries, inform you about industrial, social and political campaigns, and accept your application for membership. You may supply personal information to the AFPA 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 or employee, or signing up to a campaign. The AFPA only collects personal information that is necessary for the AFPA to perform its functions and/or activities.

Depending upon the circumstances you may provide to the AFPA, and the AFPA 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 date of birth;
- your beneficiaries;
- your employment details;
- your educational qualifications; and
- your inquiry or complaint details.

Some personal information is considered sensitive information 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.

The Privacy Act allows the Association to collect sensitive information which relates solely to AFPA members or people who have regular contact with the AFPA if the sensitive information relates to AFPA 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 AFPA in accordance with this Policy. 'Consent' is given upon your completion of AFPA membership application and membership. A member seeking AFPA services and assistance either in person, by phone, email, fax or via our website, provides consent to the AFPA to utilise your details, appropriately within the context of the services requested.

Where you provide information to the AFPA 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 AFPA. Where you provide the details of referees, you confirm that you have informed the referees that you are providing their contact information to the AFPA and they have consented to the AFPA contacting them and discussing the personal information you have provided in relation to the job application.

We will collect personal information directly from you unless:

- you have consented to the AFPA's collection of your personal information from third parties - for example, from your representatives; or
- we are legally required to do so; or
- it is unreasonable or impractical to do so.

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.

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.

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 APPs. 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 record, we will, if it is lawful and reasonable to do so, destroy the information or de-identify the information.

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

The AFPA 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 AFPA elections;
- maintain and improve member benefits and services.

Using your information for direct marketing

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.

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.

Unsubscribing and opting out

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;
- The AFPA may, from time to time, send you text messages about issues of importance such as events or campaigns. You may "opt out" by texting STOP in reply to a text message from the AFPA; or
- You may contact us at any time by mail or email directed to our CEO.

Disclosure of your personal information

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

- government bodies or agencies;
- organisations to whom we outsource functions (including information technology providers, print service providers, mail houses);
- otherwise as you have consented; and/or
- otherwise as permitted by law.

If any of these organisations are located outside Australia, you expressly consent to us disclosing your personal information to those organisations.

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 APP, 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.

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

How the AFPA holds personal information

Wherever reasonably practicable the AFPA holds electronic personal information on data servers that are owned and controlled by the AFPA in Australia. The data servers are password protected and login secured. However, by providing personal information to the AFPA 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 AFPA 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 is not regarded as a disclosure.

Wherever reasonably practicable the AFPA holds physical personal information in access controlled premises.

When the AFPA 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.

Government Identifiers

We will not adopt as our own identifier a 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 AFPA to verify your identity for the purposes of our activities or functions;
- is reasonably necessary for the AFPA 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.

How you may seek access and/or correction to personal information held by the AFPA

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 AFPA holds via individual password protected membership area of the AFPA website. To request access to, correction of, or updating of any personal information held about you, please write to the AFPA at the following address:

The Australian Federal Police Association
PO Box 4576
Kingston ACT 2604

General enquiries can be made via telephone by calling the following number:

+61 2 62851677

The AFPA may require that you provide proof of identity in order to seek access to your personal information. The AFPA may refuse to provide access if permitted to do so by law or under the APPs. The AFPA will seek to provide you with access to your personal information within 30 days of receipt of a valid request.

You should contact the AFPA when your personal information details change, alternatively you should update your personal details on the AFPA members secure area of the website.

It is important that we keep our membership details up to date. Please contact the AFPA office for assistance with updating any personal information. The AFPA may also take steps to update your personal information by reference to publicly available sources such as telephone directories or electoral rolls or personally with you upon direct contact (i.e. by phone).

AFPA Membership can be contacted at the following address:

afpa@afpa.org.au

How you may complain about a breach of the APPs

To make a complaint about an alleged breach of the APPs please write to or email the General Manager at one of the following addresses:

Australian Federal Police Association
PO Box 4576
Kingston ACT 2604

Email: afpa@afpa.org.au

All complaints must be written. Please provide all details about your complaint as well as any supporting documentation to the General Manager.

How the AFPA will deal with complaints

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

Variations to the Policy

This Policy may be varied from time to time and an updated version will be posted on the AFPA's websites. Please check our websites regularly to ensure that you have the most recent version of the Policy.