



POLICY NAME:	Privacy
POLICY LEVEL:	Governance and Operations
REGULATORY, STATUTORY, ORGANISATIONAL COMPLIANCE	Statutory
OTHER DOCUMENTATION	Privacy Act
POLICY STATEMENT	<p>This Privacy Statement explains in general terms how Arrow Leadership protects the privacy of all individuals' personal information under the National Privacy Principles. It will apply to any personal information provided to Arrow Leadership:</p> <ul style="list-style-type: none"> • when providing us information as part of a general enquiry, • when becoming a subscriber or member of the foundation, • when registering for our services, workshop programs, residential programs including coaching services, • and any other agreement or arrangement with Arrow Leadership. <p>This Privacy Statement will also apply to any information that is provided to us by someone else.</p>
DATE APPROVED:	29/07/2013
REVIEW SCHEDULE:	Every 3 years

Arrow Leadership is committed to protecting the privacy of personal information it collects, holds and administers. Personal information is information, which directly or indirectly identifies a person.

Arrow Leadership recognises the essential right of individuals to have their information administered in ways they would reasonably expect – protected on one hand, and made accessible to them on the other. These privacy values are reflected in and supported by our core values. Arrow Leadership has adopted the respective Privacy Principles contained in the National Privacy Laws as minimum standards in relation to handling personal information.

In broad terms this means that we:

- Collect only information which the organisation requires for its primary function;
- Ensure that individuals, members and stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

Protecting Your Privacy

Protecting your privacy and the confidentiality of your personal information is important to us. The information that follows is in line with the Privacy Act.

Arrow Leadership is a 'peak' national and interdenominational, training and networking program for emerging Christian leaders who have a passion for evangelism, demonstrated leadership skills and lives reflecting Jesus' heart and character. As a not for profit Christian organisation our mission is to be led more by Jesus, to lead more like Jesus and to lead more to Jesus.

1. What is Personal Information?

The information requested allows us to manage risk, provide reasonable care, and administer your contribution to Arrow Leadership. Your personal information is also collected for research to develop our programs and services. If you do not wish us to contact you regarding other services please call us on (03) 9898 9111.

2. What Information Do We Collect?

The types of personal information that Arrow Leadership collects will be specific to your involvement with the organisation, and depend on the circumstances of collection and on the type of services or programs requested from us. Generally, information is related to:

- Names;
- Addresses (including postal and billing addresses, e-mail addresses);
- Mobile, telephone and facsimile numbers;
- Date of Birth;
- Gender;
- Nationality;
- Marital status;
- Education and training;
- Details about next of kin including spouse, parent's and children's names;
- Health information;
- Occupation and employment history;
- Membership and professional associations;
- Religious or philosophical beliefs;

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- Criminal history;
- History of involvement in Arrow Leadership activities;
- Financial details and donor history;
- Photographic images video clips and sound recordings.

or other program details to provide quality service,

In some cases, Arrow Leadership will also collect and maintain your "sensitive information". This may include information or an opinion about an individual's:

- Religious beliefs, affiliations or philosophical beliefs;
- Membership of other organisations or professional associations;
- Health; or
- Criminal record.

We are required by law to obtain consent to the collection of "sensitive information" and will assume that consent to collect all information that is provided to us for use in accordance with this Statement, unless individuals tell us otherwise.

Arrow Leadership will only collect sensitive information when the collection:

- Is undertaken with the person's consent;
- Is required by law;
- Is necessary to prevent or lessen a serious and imminent threat to the life or health of the person;
- Relates solely to the members of Arrow Leadership and in which case Arrow Leadership undertakes to the members not to disclose the information without their consent; or
- Is necessary in respect of a legal claim.

Arrow Leadership will only collect personal information necessary for one or more of its legitimate functions or activities.

Arrow Leadership will collect the personal information only by lawful and fair means and not in an unreasonably intrusive way.

Whenever Arrow Leadership collects personal information about an individual, we will take reasonable steps to ensure that the individual is aware of:

- Who Arrow Leadership is;
- The fact that he or she is able to gain access to all personal information held about them by Arrow Leadership;
- The purpose for which the information is collected;
- The consequences for the individual if all or part of the information is not provided;
- Any organisations to which Arrow Leadership usually discloses the type of information being sought; and
- Any laws that require Arrow Leadership to collect the information.

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3. How We Collect Information

Arrow Leadership may collect personal information about people when they deal with us over the telephone, send us correspondence (whether by letter or email), visit our web sites or when they have contact with us in person.

Arrow Leadership will only collect sensitive information in alignment with National Privacy Principles.

As well as collecting information directly from a person, there may be occasions when we collect information about an individual from one of our consultants engaged in programs with us.

4. How We Use Personal Information

We generally collect personal information for the following purposes:

- recruitment of potential and prospective office holders, staff, volunteers and contractors;
- promotion and performance management of office holders, staff, volunteers and contractors;
- to process applications;
- to facilitate programs; or
- to register your interest in being a donor, sponsor, or program participant.

Some of the personal information we collect is essential for us to be able to accurately identify who is using our services and programs, as well as what their interests are.

Where possible Arrow Leadership will collect personal information about an individual only from that individual. If, however, this information is collected from someone else, Arrow Leadership will act reasonably to ensure that the individual is aware of the purpose and content of the information collected.

5. Online Privacy

Arrow Leadership may collect personal information through the Arrow Leadership website and the website may also collect information, which may or may not be personal information. For each visitor to the website, the server may automatically recognise and store:

- The visitor's address (e.g. the domain name or internet protocol address);
- The type of internet browser used by the visitor;
- Address of the site which "referred" the visitor; and/or
- Clickstream data.

In addition, the website may use "cookies" to track website usage and statistics. Visitors may set their browsers to refuse cookies, which may limit access to some functions. Tracking will be conducted in such a way to ensure the anonymity of visitors.

The Arrow Leadership website may contain links to third party websites. Arrow Leadership is not responsible for the privacy practices of these sites.

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6. Data Quality, Security and Retention

Arrow Leadership will take reasonable steps to make sure that the personal information it collects, uses, or discloses is accurate, complete and up to date and will regularly provide opportunities to individuals to revise and update their personal information.

Arrow Leadership safe-guard the information we collect and store and will take reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure. This includes physical security; computer and network security and personnel security.

Arrow Leadership will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed. In instances where information is archived, Arrow Leadership will take reasonable steps to ensure the security of this information.

7. Access and Correction of Personal Information

Arrow Leadership aims to ensure that your personal information is accurate, up to date and complete. Please contact us on (03) 9898 9111 9am-5pm, Mon-Fri if you; would like to seek access to, or revise your personal information or feel that the information we currently have on record is incorrect or incomplete or believe that the privacy of your personal information has been interfered with. In these cases you are entitled to raise your concerns. Your complaint will be managed and resolved appropriately.

Arrow Leadership will, on request, provide individuals with access to the information we hold about them, unless there is an exception, which applies under the National Privacy Principles, including for the purpose of correcting or updating that information. We may recover from an individual our reasonable costs of supplying them with access to this information. A request to provide access to this information will be dealt with in a reasonable time. If we refuse to provide an individual with access to the information, we will provide them with reasons for the refusal and inform them of any exceptions relied upon under the National Privacy Principles.

Arrow Leadership may, however, choose not to provide individuals with access to such information. This will include cases where:

- providing access would have an unreasonable impact on the privacy of other individual's;
- the request for access is frivolous or vexatious;
- the information relates to anticipated or existing legal proceedings and would not be discoverable in those proceedings;
- providing access would reveal the intentions of Arrow Leadership in relation to negotiations with the individual in such a way as to prejudice those negotiations;
- providing access would be unlawful; or
- providing access would be likely to prejudice an investigation of possible unlawful activity.

If a person can show that Arrow Leadership holds information that is incorrect, incomplete or out of date, Arrow Leadership will take reasonable steps to correct the information.

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8. Identifiers and Maintaining Anonymity

Arrow Leadership will not adopt an identifier in respect of personal information that is the same as an identifier used by the Commonwealth Government.

Wherever it is lawful and practical, Arrow Leadership will allow individuals the option of not identifying themselves when entering into transactions with it.

Arrow Leadership gives participants, members and stakeholders the option of not identifying themselves when completing evaluation forms or opinion surveys.

9. Transborder data flows

Arrow Leadership will only transfer personal information about an individual to a third party who is in a foreign country in specified circumstances. This would include:

- Where the individual consents to the transfer;
- Where Arrow Leadership has taken reasonable steps to ensure that the information, which has been transferred, will not be held, used or disclosed by the recipient of the information inconsistently with the National Privacy Principles.

10. Complaint Handling Process

A complaint by an individual regarding an alleged breach of privacy by Arrow Leadership should be forwarded in writing to the following address:

Privacy Compliance Officer
Arrow Leadership
Level 2, 3/5 Burwood Highway
Wantirna Vic 3152
Phone: 03 9898 9111

Arrow Leadership will respond to their query or complaint within 14 days. The Privacy Compliance Officer will be made available to investigate and resolve the complaint internally through mediation with the individual.

If the individual is not happy with the resolution of their complaint by the Privacy Compliance Officer, they may then complain to the Privacy Commissioner about the act or practice they consider to be an interference with their privacy. The Commissioner has the power to investigate the alleged breach by examining witnesses, obtaining documents and directing individuals to attend compulsory conferences. The Privacy Commissioner's determination in such cases is enforceable by the Federal Court.

11. Disclosure of Personal Information to Third Parties

Arrow Leadership relies on third party suppliers (contractors, volunteers, agents, consultant and services providers) to carry out specialised services. These third parties act on behalf of Arrow Leadership. We may disclose personal information to third parties, for example, to our program facilitators, coaches and/or consulting associates and/or community leaders engaged in programs to whom we contract or partner certain services, for the purpose for which the information was collected or for related purposes, for example to complete a transaction on the individual's behalf or provide them with a service that they requested. When personal information is provided to third parties to enable them to perform their agreed activities, these parties are prohibited from using the information for any other purpose. We

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also ensure that they are aware of our obligations under the Privacy Act and that they agree to be bound by these obligations.

We may also disclose personal information to various law enforcement agencies and governments around the world for security, customs and immigration purposes. Arrow Leadership engage third party contractors and partners to perform services for us which involves the contractor handling personal information we hold. In these situations, we prohibit the third party contractor from using personal information about any individual except for the specific purpose for which we supply it. Other than the above, we will not disclose your personal information without an individual's consent unless disclosure is either necessary to prevent a threat to life or health, authorised or required by law, reasonably necessary to enforce the law or necessary to investigate a suspected unlawful activity.

12. Openness

Arrow Leadership ensure stakeholders are aware of the organisation's Privacy Policy and its purposes and make this information freely available in relevant publications and on the organisation's website.

13. Changes to This Privacy Statement

Arrow Leadership may amend this Privacy Policy as our business requirements or the law changes. Any changes to this Privacy Policy will be updated on our website where the most current privacy statement is available.

14. Responsibility

Arrow Leadership's Board is responsible for adopting this policy. Arrow Leadership's office holders, staff, volunteers, and contractors are responsible for the implementation of this policy. The Board and Executive Director are responsible for monitoring changes in Privacy legislation and for reviewing this policy.

15. Date of Implementation

Version 1.0 of this policy document was fully implemented from 18 November 2008. Version 2.0 of this policy document will be fully implemented from 12 August 2013.

APPROVED:	Version No. 2.1
Signature:	
Name:	Mr Liam Glover
Title:	Executive Director of Arrow Leadership
Date:	12 August 2013

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REVIEW:

Review 1	___/___/___	Version No.
Review 2	___/___/___	Version No.
Review 3	___/___/___	Version No.
Review 4	___/___/___	Version No.
Review 5	___/___/___	Version No.