

Document Title	Privacy Policy
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Contact Officer	Chief Executive Officer
Legislative or Regulatory References	Privacy and Data Protection Act 2014 (amended) (Vic) Local Government Act 1989 Health Records Act 2001 (Vic)
Review Date	April 2019 or when related practices change
Related Documents	GLC Privacy Statement 2018 GLC Code of Conduct – Staff GLC Membership Terms and Conditions

Version control

Version Review	Date	Author	Comment
1	April 2018	Policy Officer	Adopted by Board March 2018

Definitions

Handling	The collection, holding, management, use, disclosure or transfer of personal information
Information Privacy Principles (IPP)	The ten principles set out in Schedule 1 of the Act.
Library Member	A member of the public who has registered as a library member and has provides the necessary information to receive a membership number (a unique identifier) and card.
Patrons	Members of the public who access the library services, spaces and/or facilities but are not utilising these services as a library member.
Personal information	For the purposes of the Act, personal information means information or an opinion (whether true or not) about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. Personal information can include name, date of birth, sex, address, financial information, marital status and education and employment history.
Privacy	Recognised broadly as a human right in the United Nations Declaration of Human Rights and the International Covenant on Civil and Political Rights. In Victoria, a right to privacy is included in the Victorian Charter of Human Rights and Responsibilities Act 2006. Privacy encompasses several overlapping notions, including secrecy, confidentiality, solitude of the home, informational self-determination, freedom from surveillance, and the protection of an individual's intimate relationships.
Sensitive information	Some personal information is classed as 'sensitive information' Sensitive information is information about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or a trade union, sexual preferences or practices and criminal record.
Unique identifier	A code consisting of alphabetical characters and/or numerals that is assigned to an individual and distinguishes them from other individuals. For example, a Library registration number. A persons' name alone is not a unique identifier.

1. Purpose

The Goldfields Library Corporation (**GLC**) values an individual's right to privacy and is committed to protecting the personal information it collects and uses. As a public sector organisation, the GLC is required to comply with the Victorian *Privacy and Data Protection Act 2014 (Vic)* (amended) (**Act**).

Privacy protections are embodied in ten Information Privacy Principles (**IPPs**) set out in Schedule 1 of the Act. The IPPs govern the handling of personal information by Victorian public sector organisations, local councils and contracted service providers.

The purpose of this policy is to outline the organisation's information management practises in a broad sense aligned to the IPPs of the Act. These are:

1. Collection
2. Use and disclosure
3. Data quality
4. Data security
5. Openness
6. Access and correction
7. Unique identifiers
8. Anonymity
9. Transborder data flows
10. Sensitive information

This policy should be read in conjunction with the *GLC Privacy Statement* document. GLC privacy statements act as collection notices as required under the Act.

2. Policy

This policy relates to the collection of personal information for the purposes of the GLC's strategic and organisational objectives. The GLC mission is to enrich our communities and we endeavour to do this through:

- Access to a collection that is relevant and responsive to build knowledge, enrich our culture and for enjoyment.
- Programs, activities, workshops and learning opportunities that enable people to explore their interests, connect with others and expand their thinking.
- Innovative infrastructure and digital services that inspire and excite our community and enhance service provision.
- Welcoming and functional spaces that are both physical and virtual, that enable people to work, connect, learn and relax.
- Investing in our people through training, development and recruitment to build a highly skilled team that adds value to our collection and spaces, user experience and community engagement.
- Working collaboratively to deliver organisational sustainability whilst achieving strategic investment in areas that optimise equity in community access and services across the region.

To fulfil the purpose and functions of the GLC, we collect information from staff, volunteers, work and student placements, contractors, library patrons and registered library members for the purposes of:

- Recruiting, employing and managing staff.
- Engaging and managing volunteers, student work experience and work placements.
- Engaging and communicating with contractors, partners and service providers.
- Registering library members and providing them with services and transactions.
- Registering patrons for Home Library Services and providing them with services and transactions.
- Bookings and transactions for activities and events and venue hire.
- Accessing the collections and resources, either in person or online.
- Accessing other collections through interlibrary loans and BRAC.
- Providing technical and other assistance on GLC public computers and Wi-Fi.
- Contributing to comments on social media and online.
- Completing surveys and providing customer feedback.
- Seeking permission to record and publish photographs, videos and audio.
- Providing a safe environment for staff and patrons through surveillance and incident reporting.
- Fulfilling electronic financial transactions.
- Subscribing to e-newsletters and other communications about library events and activities.

The GLC has adopted Privacy by Design (PbD) as a methodology for considering privacy and the handling of personal information when reviewing or developing information systems, business processes and networked infrastructure.

All GLC staff are provided with information about the Act and the IPPs to assist them in their work practises and ensure the appropriate and respectful handling of personal information.

2.1 Collection of personal information

Where possible, the GLC collects personal information only from that person. Under some circumstances we may need to collect personal information from someone else; for example for the establishment of Home Library Services or in an emergency. In these cases we take reasonable steps to ensure the individual consents to the collection of their data and is provided with a privacy statement.

2.2 Use and disclosure

The GLC does not disclose personal information unless authorised by law or with consent.

The GLC uses personal information for the purpose for which it was collected, or in some circumstances for a related purpose, associated with library services and functions. External organisations to which the information is disclosed can include contracted service providers performing services for, or on our behalf.

The GLC may be lawfully required to use or disclose personal information in order to meet our obligations under other legislation. This may include sharing information, such as CCTV footage or membership details, with government departments or agencies such as Victoria Police. Requests for obtaining personal data from the GLC for these purposes must be made in writing to the Chief Executive Officer by an appropriate officer in the form of an email, search warrant or court order.

2.3 Data quality

The GLC endeavours to ensure that the personal information we handle is accurate, complete and up to date. However, we rely on individuals to provide their information and to advise us of any changes to the information. To assist with this, library memberships expire every five years and members are required to verify their personal information to renew their registration.

2.4 Data security

The GLC takes reasonable security steps when handling the personal information collected through the provision of secure computer systems and staff procedures. Staff are required to handle information appropriately and undertake reasonable security steps to minimise the risk of misuse of the data. Any personal information that is no longer required is destroyed.

For administration purposes, membership data of inactive patrons is archived annually. The information is retained permanently on the database to assist with data comparisons, such as usage levels, for reporting purposes.

2.5 Openness

The Act requires the GLC to provide a collection notice before, or as soon as possible after, we collect information from or about an individual. The collection notice is provided in the form of a privacy statement. The *GLC Privacy Statement* provides detailed information on the collection and handling of personal information and is available online and in hard copy at library branches and agencies. Simplified and specific privacy statements are provided as required.

Privacy statements include:

- The GLC's contact details.
- The reason for collecting the information.
- The types of organisations or individuals the GLC might disclose the information to.
- The individual's right to gain access to the information.
- Whether any law requires the information to be collected.
- Consequence of not providing the information.

2.6 Access and Correction

Individuals can request access to, and correct, their personal information held by the GLC and we will take reasonable steps to provide this information. Simple retrievable information, such as that available on the membership database, can be provided informally at a library branch. More complex information requests should be made in writing to the Chief Executive Officer.

2.7 Unique Identifiers

The GLC assigns unique identifiers to carry out its functions efficiently. These include allocating a library membership registration number, using a payroll number for staff and taking credit card and banking details for payments. These may be shared with contractors to fulfil the purposes of the GLC. For example, the membership registration number may be shared with the library information systems provider and website provider.

2.8 Anonymity

GLC members and patrons can access the library facilities and services, collections on site, the catalogue, and aspects of the GLC website, without requiring identification or a unique identifier.

Where identification is required, the GLC provides guidance on any limitations of access resulting from choosing to transact anonymously or with limited information. For example, if a member prefers not to provide their email address, they will not receive e-newsletters, library notices and other communications regarding their membership via email.

2.9 Transborder data flows

The GLC discloses personal information to third parties such as its contracted service providers for the purposes of administrative functions. It is the GLC's intention that service providers are required to comply with the Act and IPPs. In some circumstances, the GLC may transfer personal information outside Victoria, such as to servers of third party organisations.

The GLC website contains links to webpages not operated by the GLC. The GLC is not responsible for the privacy practices or content of other websites and it is recommended that users familiarise themselves with the terms and conditions and privacy policy of these pages.

2.10 Sensitive information

The GLC generally does not require the collection of sensitive information from members and patrons. In circumstances where this information is collected, such as for recruitment, Home Library Services or research, it is done in accordance with Principle 10 of the Act.

In certain circumstances, the GLC may collect health information, such as for employment records or Home Library Services. In these cases the information is managed in accordance with the requirements of the *Health Records Act 2001* (Vic) and the Health Privacy Principles.

3. Further information

For further information on the Victorian Privacy and Data Protection Act 2014 (Vic) (amended) and the ten Information Privacy Principles, please contact the Office of the Victorian Information Commissioner (OVIC).

Queries about the GLC privacy policy and statement and related personal information enquiries should be made in writing to:

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PO Box 887, Bendigo, Victoria, 3552
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