

# EMPLOYEE PRIVACY POLICY



Last Reviewed	June 2023
Next Review	January 2024
Responsible Officer	Governance & Projects Specialist
Applicable Legislation	Privacy Act 1988 (Cth)
Relevant Policies	IT Acceptable Use Policy
Related Procedures	Information Security Manual

## WAFC CORE VALUES

*Our People | Our Relationships | Being our very best | Leading our Industry*

## PURPOSE

The Western Australian Football Commission Inc. (**WAFC**) believes privacy is an important right of individuals. In the context of your (past or present) employment with WAFC, we may process personal information about you. The WAFC takes steps to protect your personal information from misuse and to use your information only in the ways described in this privacy policy and in accordance with the *Privacy Act 1988 (Cth)* (**Privacy Act**) and the Australian Privacy Principles contained within.

Except where otherwise indicated, terms used in this privacy policy have the same meaning as those in the Privacy Act.

## Information subject to this policy

This policy does not apply to any information that constitutes an 'employee record' for the purposes of the Privacy Act. Employee records are personal information about you that relates to your employment with WAFC. Employee record information includes information such as:

- the terms and conditions of your employment;
- records of your engagement, training, discipline, resignation or termination as an employee with WAFC;
- your personal and emergency contact details;
- salary and wage information;
- your membership of a professional or trade association or trade union membership;
- your accrued leave, including personal, long service, sick, maternity or paternity and other annual leave; and
- your taxation, banking and superannuation affairs as it relates to your employment.

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Our collection, processing and disclosure (where applicable) of employee record information is exempt from the operation of the Privacy Act and will be collected, processed and disclosed in accordance with your employment agreement with WAFC and other applicable laws.

## Management of employee personal information

This employee privacy policy is available on WAFC SharePoint, and we can also provide a hard copy version upon request. If you would like more information or a hard copy of this policy, please contact us by reaching out to our Human Resources department or at:

- [hr@wafc.com.au](mailto:hr@wafc.com.au)

You should use the details above to contact us if you have a complaint about a breach of the Australian Privacy Principles or the Privacy Act by us. We will respond to your complaint and endeavor to resolve it as soon as possible. If you are not satisfied with our response, you can lodge a complaint with the Office of the Australian Information Commissioner: see <http://www.privacy.gov.au/complaints>.

## Collection of personal information

We only collect personal information from employees where reasonably necessary to maintain a functioning and positive workplace. We will only collect personal information by lawful and fair means.

We will not intentionally collect sensitive information about you. However, there may be certain circumstances where we inadvertently collect sensitive information in the course of our ordinary functions or activities. These circumstances may include where you provide sensitive information in connection with terms of employment or store images or other information that include sensitive information about you on our systems or equipment that are subject to review and access in accordance with our Information Security Manual. To the extent you inadvertently provide us with any sensitive information, you are deemed to have consented to the collection of that information in accordance with this privacy policy. You may withdraw such consent at any time by contacting us.

This privacy policy applies to personal information (that is not an employee record) held by the WAFC and collected in connection your employment with WAFC, whether collected:

- by telephone;
- in person;
- by documents posted to us or handed to or collected by us;
- via our IT systems;
- from third parties; or
- some other means.

We may store your personal information in hard copy, in electronic form, on electronic devices or on computer databases.

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We will only collect personal information about you from a third party if it would be unreasonable or impracticable to collect the information directly from you. In these circumstances, the WAFC may collect personal information about you from third parties, such as third-party service providers that have been engaged to provide services on our behalf

Where we collect information about you from a third party, we will take reasonable steps to ensure that you are made aware of the facts and circumstances of that collection.

The types of personal information (other than employee record information) that we may collect includes, but is not limited to:

- (a) **WAFC Equipment Data:** When you use WAFC equipment, such as staff laptops or phones, for purposes not connected with employment in accordance with *WAFC IT Acceptable Use Policy* you may store personal information, such as personal emails, documents, photographs and videos and other personal information. Such information may be accessed in accordance with our Information Security Policy, which may include, for example when you return your device to us for data-deletion, incident management or systems analysis. We do not intentionally collect personal information that is not related to your employment with WAFC and will cease collecting or storing such information as soon as practicable following the collection of such information coming to our attention;
- (b) **Other Information:** You may provide us information through your participation in staff surveys or other sources that are implemented, published or adopted by us, participation and response in all such matters are strictly at your discretion;
- (c) **Mobile Data Information:** You may access or use our SharePoint or other WAFC systems via a mobile device or application. We may collect information about you and your device, such as your IP address, location or device information, and any other information provided by your mobile device.

## Use or disclosure of personal information

Personal information (other than employee record information) collected by the WAFC is used primarily for the purpose it was collected, which will be advised to you from time to time.

We will not use your personal information for a secondary purpose unless you consent or where the use or disclosure is strictly required, and we would otherwise be permitted to do so in accordance with the Privacy Act.

We will only disclose your information to the extent contemplated when collecting such information from you or as otherwise requested or authorised.

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## Cross-border disclosure of personal information

The WAFC does not send personal information overseas. In the event any circumstance were to arise where cross-border disclosure may be required, the WAFC will ensure that it does not send your personal information to recipients outside of Australia without first obtaining your consent or otherwise complying with the Privacy Act.

## Quality and security of personal information

We keep your personal information as accurate, complete and up to date as possible.

We take reasonable steps to protect your data from misuse, interference, and loss, and from unauthorised access, modification, or disclosure. All personal information collected and held by WAFC is subject to WAFC's Information Security Policy. In accordance with this policy, your personal information is stored on secure servers and is only accessible by those persons who need access to the information or in order to carry out our services. We also maintain physical security measures to protect the use and storage of physical records containing your personal information.

We will destroy or permanently de-identify personal information about you which is no longer needed for the purposes described in this privacy policy.

## Access to personal information

You have the right of access to personal information (other than employee record information) which we store about you. If you are of the belief that we hold personal information relating to you and you wish to obtain access to this information, please contact us on the details provided above in section – "Management of employee personal information".

In the event that such a request is made, we will review our records to determine what personal information (other than employee records) relating to you we hold and will respond to your request within a reasonable period after the request is made. Once we have notified you of the nature of the personal information relating to you which we hold, we will give you access to your personal information in the manner requested by you, if it is reasonable and practicable to do so. If we refuse to give you access to your personal information for any reason, we will give you a written notice that sets out our reasons for the refusal and the mechanisms available to complain about our refusal.

## Correction of personal information

If we hold personal information about you and we are satisfied that the information is inaccurate, out-of-date, incomplete, irrelevant, or misleading, or you request that we correct the information, we will take reasonable steps to rectify the situation. We will correct your personal information upon request. If we refuse to correct your personal information, we will give you a written notice setting out our reasons for refusal and the mechanisms available to complain about the refusal.

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## Changes to this privacy policy

We may update this policy from time to time. If we change this policy in any material way, provide an email to all staff prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

The effective date of this policy is: 26 June 2023.