Privacy Policy

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Table of Contents

1. Policy Overview 4
   - 1.1 Introduction 4
   - 1.2 Purpose 4
   - 1.3 Scope 4
   - 1.4 Responsibilities 4
   - 1.5 Authority 5
   - 1.6 Review 5
   - 1.7 Breach of this Policy 5
   - 1.8 Availability of this Policy 5
   - 1.9 Useful Resources 5
2. What Information We Collect 5
3. How We Collect Information 6
4. Why We Collect and Use Information 6
5. Disclosure of Personal Information 7
6. Storage and Security 7
7. Overseas Disclosure 8
8. Access and Correction 8
9. Privacy Complaints 8
10. Contact Details 9
11. Definitions 9

1. Policy Overview

1.1 Introduction

Football West is the sole governing body for football in Western Australia and represents all levels of competition, development and coaching in metropolitan and regional areas. The world game is a powerful and unifying force in the WA community, bringing together football fans and participants regardless of age, gender or ethnicity.

Football West, which is affiliated to FA and FIFA, has created an environment that brings the game to life on parks, pitches and indoor centres around the state.

1.2 Purpose

Football West is committed to protecting Personal Information and handling it responsibly in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

This Policy explains how Football West collects, uses, stores and discloses Personal Information, and how individuals can access or correct their information or make a privacy complaint.

1.3 Scope

This Policy applies to Football West and all Employees, Directors and Volunteers who collect, access, use, store or disclose Personal Information on behalf of Football West.

Football West requires contractors, consultants and service providers handling Personal Information on its behalf to comply with appropriate privacy and information security requirements.

1.4 Responsibilities

The following responsibilities have been assigned:

Role	Function
Board	• Approve this Policy and any amendments.
CEO	• Oversee implementation of this Policy. • Review this Policy and recommend changes to the Board.
COO	• Support implementation and operational compliance with this Policy. • Review this Policy and recommend updates to the CEO.
CFO	• Support implementation of financial and information management controls relevant to this Policy.
Integrity and Governance Manager	• Coordinate privacy enquiries, complaints and incidents. • Support the review and management of privacy risks. • Review this Policy and recommend updates to the CEO.
Leaders	• Promote compliance with this Policy within their areas of responsibility.
Employees	• Comply with this Policy when handling Personal Information.

1.5 Authority

This Policy derives its authority from the Board. The Policy is effective from the date of Board approval.

1.6 Review

This Policy will be reviewed and updated every two years or earlier if required by legislative, regulatory, operational or organisational change.

1.7 Breach of this Policy

Failure to comply with this Policy may result in disciplinary, contractual or other appropriate action.

Privacy incidents, suspected privacy breaches and unauthorised access, use, disclosure, loss or destruction of Personal Information must be reported promptly to Football West.

Football West will assess and manage privacy incidents in accordance with its applicable policies, procedures and legal obligations.

Where appropriate, matters may also be referred to external authorities, including law enforcement agencies.

1.8 Availability of this Policy

This Policy will be published on the Football West website and made available free of charge. A copy may also be provided in another appropriate form on request.

1.9 Useful Resources

Further information about privacy obligations and the Australian Privacy Principles is available at: oaic.gov.au

2. What Information We Collect

Football West may collect Personal Information that is reasonably necessary to administer Football Activities, provide services and meet legal or operational obligations.

This may include:

- name and contact details;
- date of birth and gender;
- registration and participation information;
- Club affiliation and football history;
- emergency contact details;
- payment and transaction information;
- photographs, video footage or CCTV recordings;
- website and system usage information;
- safeguarding, disciplinary or complaint information (including Working with Children Check and screening information);
- medical or health information where reasonably necessary;

- training, qualifications, employment applications and previous employment details (including reference checks); and
- other information voluntarily provided to Football West.

Football West will only collect Sensitive Information where it is reasonably necessary and it is permitted by law (including if you have consented, or when the Australian Privacy Principles permit its collection without your consent).

3. How We Collect Information

Football West generally collects Personal Information directly from individuals when they:

- register to participate in Football Activities;
- submit forms or applications;
- contact Football West;
- attend Football West events or programs;
- use Football West websites or systems;
- participate in competitions, education or disciplinary processes;
- complete surveys, feedback forms or other stakeholder engagement activities; or
- apply for volunteer or paid employment with us.

Football West may also receive Personal Information from Clubs, Associations, Football Australia, service providers, football participants or other third parties where it is unreasonable or impracticable to collect the information directly from the individual.

This may include information required to govern, administer or regulate Football Activities, or information relating to safeguarding, integrity, disciplinary or complaint matters where direct collection could compromise the purpose of the process.

4. Why We Collect and Use Information

Football West collects and uses Personal Information for the following primary purposes:

- administer Football Activities, including competitions, registrations and programs;
- communicate with participants, clubs and stakeholders;
- manage safeguarding, integrity, disciplinary or complaint matters;
- provide education, events and development programs;
- process payments and manage accounts;
- improve Football West services and systems;
- meet legal, regulatory and governance obligations;
- recruit volunteers and Employees; and
- protect the safety, integrity and operation of football in Western Australia.

Football West may also use Personal Information to provide individuals with information about football-related programs, services, events or initiatives. Where required by law, Football West will obtain consent before sending direct marketing communications. Individuals may opt out of marketing communications at any time by using the unsubscribe mechanism provided or by contacting Football West.

5. Disclosure of Personal Information

Football West may disclose Personal Information for the purpose for which it was collected or for another purpose permitted under the Australian Privacy Principles. This may include where the individual has consented, where the individual would reasonably expect the disclosure and the secondary purpose is related to the primary purpose, or where disclosure is otherwise authorised or required by law.

Football West discloses Personal Information to the following bodies in various situations:

- Football Australia and affiliated football bodies;
- Clubs, Associations and Competition Administrators;
- service providers and contractors;
- insurers, legal advisers and professional advisers;
- government or regulatory authorities;
- law enforcement agencies where we reasonably believe it is necessary for their purposes or required by law; and
- other organisations or individuals where consent has been provided or disclosure is otherwise permitted by law.

Football West does not sell Personal Information to third parties.

6. Storage and Security

Information may be stored electronically through third-party systems and service providers used by Football West, or in hard copy.

Football West implements and maintains processes and security measures to protect Personal Information from misuse, interference, loss, unauthorised access, modification or disclosure. These measures include:

- The use of identity and access management technologies to control access to systems on which information is processed and stored.
- Requiring all Employees to comply with internal information security policies and keep information secure.
- Requiring all Employees to complete training about information security.
- Monitoring and regularly reviewing our practice against our own policies and against industry best practice.

Football West retains Personal Information in accordance with its Information Governance, Recordkeeping & Data Retention Policy and applicable legal requirements. Where Personal Information is no longer required to be retained, Football West takes reasonable steps to securely destroy or de-identify it in accordance with its legal obligations.

7. Overseas Disclosure

Some Football West systems and service providers may store, process or permit access to data outside Australia.

Football West's primary Microsoft systems, including Microsoft 365, SharePoint, OneDrive, Teams and related services, are hosted in Australia.

Football West may disclose Personal Information outside Australia, including to football organisations such as the Asian Football Confederation (Malaysia), FIFA (Switzerland and the United States), and other football organisations where relevant to Football Activities.

Where Personal Information is disclosed outside Australia, Football West will take reasonable steps to ensure appropriate privacy and information security protections are in place in accordance with its legal obligations.

8. Access and Correction

Individuals may request access to Personal Information held by Football West or request correction of inaccurate or outdated information. There is no charge for requesting access to, or correction of, Personal Information, but Football West may require payment of reasonable costs incurred in providing access (such as photocopying costs or costs for time spent on collating large amounts of material).

Requests should be made using the contact details below.

Football West will respond to requests within a reasonable timeframe, generally within 30 days of receiving a request, and may refuse access where permitted by law. Football West will explain its reasons for any refusal, and individuals may make a privacy complaint under section nine if they disagree.

If Football West is unable to correct an individual's Personal Information, they may ask Football West to include a statement that the individual believes their Personal Information is inaccurate, out of date, irrelevant or misleading.

9. Privacy Complaints

If an individual believes Football West has breached its privacy obligations, they may make a complaint in writing to Football West using the contact details below.

Football West will acknowledge, assess and respond to privacy complaints within a reasonable timeframe and take appropriate steps to address any issues identified.

If an individual is not satisfied with Football West's response to a privacy complaint, they may contact the Office of the Australian Information Commissioner (OAIC). Further information about making a privacy complaint is available at oaic.gov.au.

10. Contact Details

Football West
Sam Kerr Football Centre
305 Welshpool Road, Queens Park WA 6107

Phone: (08) 6181 0700
Email: integrity@footballwest.com.au↗
Website: www.footballwest.com.au↗

11. Definitions

The following definitions apply in this Policy:

Act means the Privacy Act 1988 (Cth).

Association means an association affiliated with Football West or otherwise recognised by Football West or Football Australia.

Board means the Board of Directors of Football West.

CEO means the Chief Executive Officer of Football West.

CFO means the Chief Financial Officer of Football West.

Club means an entity that is affiliated with Football West for the purpose of playing football or futsal in Competitions.

Competition Administrator means the entity responsible for the conduct and staging of a Competition.

COO means the Chief Operating Officer of Football West.

Employee means an employee of Football West.

FA means Football Australia Limited, the governing body for football in Australia.

Football Activity means any Match, Competition, program, event, course, meeting or activity conducted, sanctioned or administered by Football West or an affiliated football body.

Football West means Football West Limited ACN 109 919 324.

Match means any match played under the auspices of Football West or otherwise under Football West's direction or control.

Personal Information has the meaning given in the Act.

Policy means this Privacy Policy as amended from time to time.

Sensitive Information has the meaning given in the Act.

Interpretation

In this Policy:

- headings are included for convenience only and do not affect interpretation;

- words importing the singular include the plural and vice versa;
- references to legislation include any amendment or replacement of that legislation; and
- the use of the word includes or including is not to be taken as limiting the meaning of the words preceding it.