



Enterprise Risk and Compliance – Privacy Policy

Version	Nature of change	Title	Date
1.0	Publication	First edition	01/07/2017
2.0	2020 Under Review	Revised format edition	17/11/2020
2.1	Reviewed	Second edition	16/6/2021
3.0	Reviewed & updated	Third edition	02/06/2022
4.0	Reviewed & updated	Fourth edition	19/01/2023

Purpose

Outward Bound Australia (OBA) is required to comply with the requirements of the Privacy Act 1988 (Cth). This Privacy Policy establishes how we protect personal information and explains:

- What personal information we collect and hold
- How we use/disclose that information
- How we store that information
- Your entitlement to access personal information
- How we comply with notifiable data breaches

By “personal information”, we mean information or an opinion about an identifiable individual or an individual whose identity can be reasonably ascertained, which may include “sensitive information” (including health information).

Scope

This policy applies to all personal information collected, stored, used and disclosed by OBA.

Policy

Principles

1. What personal information we collect and hold

We only collect and hold personal information that is relevant and reasonably necessary for us to fulfil our purpose, functions and activities. These functions and activities include:

- delivery of outdoor education programs and training
- research and reporting
- contributing to the development of the outdoor education industry in Australia
- human resource management

At all times we try only to collect and hold the information we need for the particular function or activity we are conducting. We usually collect personal information directly from you or your authorised representative, for example your school coordinator or community organisation.

The main points at which your personal information may be collected by us are:

- On enrolment for an Outward Bound program
- When applying to and joining OBA as an employee
- On visiting the OBA website and social networking services such as Facebook and instagram
- When making a donation to OBA or to the Australian Outward Bound Development Fund
- When otherwise contacting or communicating with OBA

The type of information that we may collect and hold includes, but is not limited to:

- Name, address, email address, other contact details and date of birth
- Qualifications, experience and work history
- The amount of any donation made
- Testimonials and feedback that you give
- Records of correspondence between us and you
- If you apply for employment with us, details regarding your employment history, qualifications and similar information

Sometimes we may need to collect and hold sensitive information about you, for example, to ensure your safety while participating in an Outward Bound program which might include

information about your health; or to determine your suitability for employment which might include information about your criminal history. This information will only be collected and held with your consent.

The only personal information that OBA collects and holds from you via its website is that which you agree to provide, for example, when you complete an online form or application.

Where our websites allow you to make comments or give feedback, we may collect and hold your email address and sometimes other contact details. We may use your contact details to respond to your feedback. We store this personal information on servers located in Australia.

We may also use tools provided by third parties, including Google Analytics, to collect or view website traffic information. These sites have their own privacy policies. We use information collected by these tools to maintain, secure and improve our websites and to enhance your experience when using them.

We use social networking services such as Facebook and Instagram to communicate with the public about OBA's work. When you communicate with us using these services, we may collect and hold your personal information, but we only use it to help us communicate with you. The social networking service will also handle your personal information for its own purposes. These sites have their own privacy policies.

2. How we use / disclose that information

In general terms, personal information we hold may be used by OBA or disclosed to third parties for one or more of the following purposes:

- Ensuring your safety while participating in an Outward Bound program. This may involve the disclosure of personal or sensitive information to third parties including ambulances or other rescue and medical services.
- Ensuring the safety of our employees and other participants while participating in an Outward Bound program. This may involve recording and disclosing your COVID-19 vaccination status and other sensitive information.
- Offering alumni benefits and other services to you, such as OBA's alumni newsletters and discounts. You may request that this information not be sent to you.
- Conducting or facilitating research or surveys for purposes related to OBA or its activities. This may involve disclosure of your personal information to third party researchers for the purposes of conducting research.
- Inviting you to attend OBA events. This may involve disclosure of your personal information to third party event organisers for the purpose of event registration.
- Procuring funding, donations or other support for the activities of OBA, including the Australian Outward Bound Development Fund.
- Compliance with OBA's legal obligations or other compliance requirements, including the disclosure of your personal or sensitive information to regulators, law enforcement and other authorities where we are legally obliged to do so.
- Otherwise collecting, using or disclosing personal information about you in a manner consistent with the purposes, objectives and functions of OBA.

We do not disclose sensitive information about you unless you agree, or would reasonably expect us to do so, or in the circumstances expressly set out in this Privacy Policy. We do not sell or rent the personal information we have collected to organisations such as telemarketers or mailing lists.

3. How we store personal information

We are responsible for ensuring that personal information we hold about you is protected by such security safeguards as it is reasonable in the circumstances to take against loss, unauthorised access, modification, disclosure or other misuse of your personal information.

We may use third party service providers for the storage and security of your personal information. These third party service providers may process and store your personal information and may be located outside of Australia.

We may retain your personal information for as long as necessary to fulfil the purposes we collected it for including to provide services to you and for the purposes of satisfying any legal obligations or compliance obligations.

4. Your entitlement to access personal information

You are entitled to request access to your personal information held by OBA, and ask that we correct that personal information. We will ask you to verify your identity before we give you access to or update your information and we will try to make the process as simple as possible. If we decide to deny access to your personal information, we will provide you with the reasons.

5. Notifiable data breaches

A data breach can happen when personal information is accessed or disclosed without authorisation or is lost. OBA is required to notify affected individuals and the Office of the Australian Information Commissioner when a data breach involving personal information is likely to result in serious harm.

If OBA becomes aware that there are reasonable grounds to suspect that there may have been an Eligible Data Breach in relation to any personal information held by OBA, we will agree to:

- I. Notify relevant individuals, clients or customers in writing as soon as possible, which must be no later than three (3) days of becoming aware; and
- II. Unless otherwise directed by the client or customer, carry out an assessment in accordance with the requirements of the Privacy Act 1988 (Cth).

6. Keeping information accurate and up to date

We make every reasonable effort to keep your information accurate and up to date, in order for us to provide the best possible service to you. You can assist by keeping us informed of any updates such as address change, email change or legal name change. If you find errors in your personal information, please advise us and we will make the appropriate corrections.

Contacting us

If you require any further information, wish to submit a complaint about a breach of privacy by OBA, wish to obtain access to your personal information held by OBA, or have any questions regarding the OBA privacy policy or its handling of personal information please contact the Corporate Services Manager Ph: 02 62355700 or mailbox@outwardbound.org.au

You may also have a right to complain to the Privacy Commissioner. For further information contact the Privacy Commissioner on 1300 363 992.

Changes to our Privacy Policy

This Privacy Policy is current as at the date set out on the front page. We may make changes to our Privacy Policy at any time. Any changes will be posted on our website.

Associated policies, forms or documents

- Privacy Act 1988

The Australian Outward Bound Foundation

ERC - Privacy Policy

- Australian Privacy Principles
- Office of the Australian Information Commissioner