Scouts SA Privacy Policy

Title	Privacy Policy	Reference	GOV-PL-003
Owner	Head of Governance, Risk and IT	Review	Every 2 years
Endorsed By	CEO	Date	October 2026
Approved By	Board	Date	October 2026

POLICY STATEMENT

Scouts SA is committed to protecting the privacy of individuals and managing personal information in an open, transparent and secure manner. This Policy explains how Scouts SA collects, holds, uses and discloses personal information and how individuals may access or correct their information or raise a privacy concern.

Scouts SA complies with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). Electronic direct marketing is also managed in accordance with applicable requirements of the Spam Act 2003 (Cth).

Where consent is required, including for the collection of sensitive information, Scouts SA will seek consent unless an exception under law applies.

SCOPE

This Policy applies to Scouts SA in all its functions, activities and operations and to Board members, employees, volunteers, contractors and service providers who handle personal information on behalf of Scouts SA.

It covers personal information about individuals who interact with Scouts SA, including members and youth members, parents and guardians, volunteers, customers, employees and applicants, supporters, suppliers and other stakeholders.

PRINCIPLES

Scouts SA will apply the following principles when handling personal information:

1 Collect only what is needed

Personal information will only be collected where it is reasonably necessary for one or more of Scouts SA's functions or activities. Sensitive information will be collected with consent unless an exception under law applies.

2 Be transparent and use information appropriately

Individuals will be given appropriate information about collection and Scouts SA will only use or disclose personal information for the purpose for which it was collected, a related permitted purpose, with consent, or as otherwise authorised or required by law.

3 Protect information throughout its lifecycle

Reasonable technical and organisational measures will be used to protect personal information. Information will be retained only for as long as it is required and will be securely destroyed or de-identified when it is no longer needed and there is no legal requirement to retain it.

4 Maintain quality and support individual rights

Reasonable steps will be taken to keep personal information accurate, up to date, complete and relevant, and individuals may request access to or correction of their personal information.

5 Be accountable

Privacy will be considered in systems, services, projects and third-party arrangements. Privacy incidents and complaints will be reported and managed promptly and in accordance with this Policy and applicable law.

HANDLING PERSONAL INFORMATION

What is personal information?

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable, regardless of whether the information or opinion is true or recorded in a material form.

What personal information do we collect and hold?

The kinds of personal information Scouts SA collects and holds depend on the individual's interaction with Scouts SA and may include:

- identity and contact information, including name, address, date of birth, gender, telephone number and email address
- membership, participation, event, activity and service information
- emergency contact, medical, health or other information needed to support safe participation
- transactional and service history, enquiries, complaints and correspondence
- information required for safety, safeguarding, insurance, claims, legal or regulatory purposes
- for employment applicants, employment history, qualifications, professional associations, residency or work status, referee details, proof of identity and other information required for recruitment or authorised screening
- information generated through the use of Scouts SA systems and services where relevant to the service being provided.

Scouts SA may combine personal information collected through different interactions where this is reasonably necessary to provide services, administer membership, maintain records, manage safety, or meet legal and operational requirements.

How do we collect personal information?

Where practicable, Scouts SA collects personal information directly from the individual. Information may be collected in person, in writing, by email or telephone, through forms and online services, or through other interactions with Scouts SA.

Scouts SA may also collect personal information from:

- a parent, guardian or authorised representative, including where information is provided for a youth member
- third parties the individual has asked or authorised to provide information, including referees
- agents, contractors and service providers acting for Scouts SA
- insurers, claims managers, witnesses and others involved in assessing, investigating or managing a claim or incident
- law enforcement agencies, statutory authorities, regulators and dispute resolution bodies
- industry databases and publicly available sources, where collection is lawful and appropriate.

If Scouts SA receives unsolicited personal information, it will consider whether the information could have been collected under the APPs. Where it could not have been collected and it is lawful and reasonable to do so, Scouts SA will destroy or de-identify the information.

At or before the time personal information is collected, or as soon as practicable afterwards, Scouts SA will take reasonable steps to provide any collection notice required by the Privacy Act.

Why do we collect, use and disclose personal information?

Scouts SA may collect, hold, use and disclose personal information where reasonably necessary to:

- process and administer membership, registrations and applications
- deliver activities, events, products, services and programs
- respond to enquiries, feedback, complaints and disputes
- support health, safety, safeguarding and incident management
- manage insurance, claims, risk, fraud prevention and audit requirements
- assess and process employment applications and authorised screening
- maintain records and understand service needs and participation
- meet legal, regulatory and governance obligations
- communicate with individuals and, where permitted, provide information about services, activities or offers that may be of interest.

Sensitive information

Scouts SA may collect sensitive information, including health information, where it is reasonably necessary for:

- membership and participation
- safety and safeguarding
- recruitment and screening
- another Scouts SA function or activity.

Unless the collection is required or permitted by law, Scouts SA will obtain the individual's consent. Health information will be handled with particular care, using approved Scouts SA systems and processes and, where required, specific consent for its collection and use.

What if you do not provide personal information?

Where personal information is necessary for a particular function or service, choosing not to provide it may mean Scouts SA cannot process an application, provide a service, support participation or otherwise deal with a request. Where lawful and practicable, individuals may interact with Scouts SA anonymously or using a pseudonym.

Disclosure of personal information

Personal information is treated as confidential and access is limited to authorised employees, volunteers, agents, contractors and service providers where access is required for their role or function.

Scouts SA does not sell or rent personal information. Personal information may be disclosed to third parties where permitted under the Privacy Act, including:

- service providers supporting Scouts SA functions, including technology and cloud service providers, consultants and professional advisers
- insurers, reinsurers, claims managers and other parties involved in managing insurance, claims or incidents
- government, law enforcement, regulatory or statutory bodies where disclosure is required or authorised by law
- other third parties where the individual has consented to the disclosure
- where another permitted use or disclosure under the Privacy Act applies.

Disclosure of personal information overseas

Scouts SA may disclose personal information to service providers, related entities or other recipients located outside Australia. The countries in which recipients may be located will vary from time to time and may include the United Kingdom and the United States of America.

Where the Privacy Act requires it, Scouts SA will take reasonable steps to ensure an overseas recipient does not breach the APPs in relation to the personal information disclosed.

How do we protect and retain personal information?

Scouts SA takes reasonable technical and organisational measures to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure. These measures may include access controls, information security systems, physical security, privacy and security training, and requirements applying to third-party service providers.

Personal information may be held electronically, including in systems operated by third-party service providers, or in paper records. Scouts SA retains personal information for as long as reasonably required for the purpose for which it was collected or as required by law. When the information is no longer required for a permitted purpose and there is no legal requirement to retain it, Scouts SA will take reasonable steps to destroy or de-identify it.

Data breaches

Scouts SA responds to suspected or actual data breaches in accordance with its data breach response arrangements and the Notifiable Data Breaches scheme under the Privacy Act. Where required, Scouts SA will notify affected individuals and the Office of the Australian Information Commissioner (OAIC).

Access to and correction of personal information

Individuals may request access to personal information held about them by Scouts SA or ask for information to be corrected if it is inaccurate, out of date, incomplete, irrelevant or misleading. Requests may be emailed to privacy@sa.scouts.com.au. Before providing access, Scouts SA may need to verify the individual's identity and, for complex requests, seek additional information or ask the individual to complete an access request form.

Scouts SA will respond within a reasonable period. A request may be refused where the Privacy Act permits or requires refusal. Where required, Scouts SA will provide written reasons for refusal and information about available complaint mechanisms.

There is no fee for making an access or correction request and no fee for correcting personal information. Scouts SA may charge a reasonable amount for providing access to personal information where permitted by law.

Direct marketing

From time to time, Scouts SA may use personal information to communicate information, services or offers that may be of interest where permitted by law. Individuals may opt out of receiving direct marketing communications at any time by using the unsubscribe mechanism in the communication, by calling 08 7134 1200 or by emailing hq@sa.scouts.com.au. Opt-out requests will be actioned in accordance with applicable legal requirements.

Privacy complaints

Privacy enquiries and complaints may be directed to the Scouts SA Privacy Officer. Scouts SA will investigate privacy complaints and aims to provide a response within 15 working days. Where additional time is required, the complainant will be kept informed.

Privacy Officer contact details:

- Email: privacy@sa.scouts.com.au
- Phone: 08 7134 1200 (9am-5pm ACST weekdays)
- Mail: Scouts SA Privacy Officer, 83 Greenhill Road, Wayville SA 5034.

If an individual is not satisfied with Scouts SA's response, or Scouts SA has not responded within 30 days, the individual may lodge a complaint with the OAIC. Information about privacy complaints is available at www.oaic.gov.au or by calling 1300 363 992.

REVIEW

This Policy will be reviewed at least every two years, or earlier where there is a significant change to privacy legislation or regulatory guidance, Scouts SA systems or information-handling practices, or the organisational environment.

ROLES AND RESPONSIBILITIES

Board	Responsible for establishing governance accountabilities for the privacy and security of personal information held by Scouts SA.
CEO	Responsible for ensuring appropriate organisational arrangements and resources are in place to support compliance with this Policy.
Privacy Officer	Responsible for overseeing implementation of this Policy, providing privacy guidance, coordinating responses to privacy incidents and data breaches, managing privacy complaints, and monitoring and reviewing the Policy.
Management and Leaders	Responsible for ensuring this Policy and supporting requirements are communicated and implemented within their areas of responsibility, and for escalating privacy concerns or incidents promptly.
Volunteers and Employees	Responsible for handling personal information only as required for their role, protecting information from inappropriate access or disclosure, complying with this Policy and supporting requirements, and reporting privacy incidents or concerns promptly.

SUPPORTING DOCUMENTS

- Privacy Act 1988 (Cth)
- Australian Privacy Principles
- Spam Act 2003 (Cth)
- Scouts SA Privacy Framework
- Office of the Australian Information Commissioner guidance, including the Notifiable Data Breaches scheme.

FEEDBACK AND FURTHER INFORMATION

For privacy enquiries, access or correction requests, and privacy complaints, contact privacy@sa.scouts.com.au. For general feedback or further information about this Policy, contact Head Office at hq@sa.scouts.com.au or 08 7134 1200.

DEFINITIONS TABLE

Australian Privacy Principles (APPs)	The Australian Privacy Principles contained in Schedule 1 of the Privacy Act 1988 (Cth).
Board	The governing body responsible for overall corporate governance of Scouts SA.
Employee/s	All paid permanent and contracted full-time, part-time, temporary and/or casual persons, including managers, supervisors, interns, apprentices, contractors and student trainees.
Personal information	Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether or not the information or opinion is true and whether or not it is recorded in a material form.
Privacy Officer	The person appointed by Scouts SA to oversee privacy matters and coordinate implementation of this Policy.
Scouts SA	The abbreviation for The Scout Association of Australia, South Australian Branch Incorporated and includes reference to all other trading and business names associated with Scouts SA.

Sensitive information	Personal information that has additional protection under the Privacy Act, including health information and specified information about an individual's personal characteristics, beliefs, affiliations, criminal record, genetic information or biometric information.
Volunteer/s	All volunteers, active members, adult helpers and other unpaid roles associated with activities for Scouts SA.