FV-02 | Privacy Policy

APPROVED BY THE COMMITTEE
Reviewed November 2026

Scope

All personal information held by Fishcare, including participants, families, applicants, volunteers and employees.

Purpose and governing principles

Fishcare collects only information reasonably necessary for its activities, keeps it secure, explains its use and respects people's choices and access rights. The EO is the privacy contact through the Fishcare contact page: https://fishcare.org.au/contact/.

The EO must document whether the Privacy Act 1988 and Australian Privacy Principles (APPs) legally apply, including turnover, health service, contractual or other coverage triggers. Fishcare adopts APP-aligned practices as its organisational standard even where an exemption applies. Victorian Health Privacy Principles apply to health information where the Health Records Act applies; a small-business exemption under federal law does not settle the Victorian position.

Collection and notice

Collect contact, role, emergency, training, screening and reimbursement details only for identified purposes. Before collection, explain who collects it, why, usual disclosures, mandatory versus optional fields, consequences of not providing it, access and complaint arrangements and relevant overseas hosting. Do not collect full identity documents, TFNs or health histories through general volunteer registration forms.

Seek express consent for sensitive information unless a lawful exception applies. Ask about functional support needs rather than unnecessary diagnoses. For children, assess capacity and obtain parent/carer consent where appropriate, involve the child and use accessible explanations. Collect from the individual where reasonable; explain third-party collection where required.

Use, sharing and images

Use information for its stated purpose, a permitted related purpose or another lawful basis. Share the minimum necessary with authorised facilitators, service providers or authorities. Reporting child safety concerns and responding to emergencies may lawfully require disclosure without consent. Do not promise absolute secrecy.

Obtain separate, specific image consent and the child's assent; explain channels and intended use. Refusal must not prevent participation. Respect withdrawal prospectively and remove material under Fishcare's control where reasonably possible, explaining limits for material already published. Do not publish identifying child details with images or live locations.

Security and retention

Use organisational accounts, MFA, restricted access, approved storage and secure transfer. Google Forms and progress sheets must not expose responses publicly; a hidden or unindexed webpage is not access control. Limit each facilitator's access to necessary records. Send progress notices with minimal details and a secure link, not sensitive answers or bank details.

Keep records securely in approved organisational systems with MFA, restricted access and an authorised backup. Retain employment and financial records for the applicable statutory periods and keep legal holds. Do not routinely delete child safety allegations, disclosures or investigation evidence. Immediately contain and report suspected information loss or unauthorised access to the EO or an unconflicted alternative, preserve evidence and assess harm and any legal notifications. Where the Privacy Act Notifiable Data Breaches scheme applies, assess suspected eligible breaches within the statutory requirements and notify affected people and OAIC promptly when required. Keep a documented retention schedule, legal holds and secure disposal process. Do not routinely destroy child safety allegations or related evidence; retain under the approved safeguarding schedule and obtain advice before disposal.

Access, correction and complaints

People may request access, correction or assistance through the EO, or the President where the EO is involved. Verify identity proportionately; respond within applicable legal timeframes, explain any lawful refusal and available review. Do not rely on the employee-records exemption as a blanket exemption for applicants, volunteers or unrelated disclosures.

Acknowledge privacy complaints promptly, investigate impartially and advise the outcome. People may approach the OAIC if the federal law applies or the Victorian Health Complaints Commissioner for relevant health privacy matters without first obtaining Fishcare permission.

Breaches

Immediately contain and report suspected loss, misdirected email, inappropriate access or disclosure to the EO. Assess harm, preserve evidence and apply notification obligations, including the Notifiable Data Breaches scheme where applicable.

References and review

Reviewed November 2026. Review again in November 2027, or earlier after a relevant legal, service or risk change.

Privacy Act 1988 (Cth): coverage and exemptions
https://www.oaic.gov.au/privacy/privacy-legislation/the-privacy-act/rights-and-responsibilities

Health Records Act 2001 (Vic) and Health Privacy Principles
https://www.health.vic.gov.au/legislation/health-records-act

OAIC: assessing and responding to notifiable data breaches
https://www.oaic.gov.au/privacy/notifiable-data-breaches/quick-reference-guide-for-responding-to-data-breaches