



aquatic achievers
swim schools

Aquatic Achievers Privacy & Media Policy

Responsible Officer: General Manager

Document History

Key Changes	Prepared By	Checked By	Approved By	Date
V2. Updates for ACF Project	Rob M	Ilona A		16.3.22

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Commitment

When it comes to privacy, we take this seriously. The information we handle is done so in line with all relevant Australian privacy guidelines, under the Privacy Act 1988. This Privacy & Media Policy contains information about how we collect and handle personal information. It also has information on what to do if stakeholders to Aquatic Achievers have questions, concerns, or complaints.

Scope

The Privacy & Media Policy applies to all team members, whether they be permanent or casual employees of Aquatic Achievers. This policy applies in all our operational environments and without fail wherever children and young people are participating in our organisation's activities, programs, services and / or facilities.

In addition to our team members, this policy applies to all parties, including but not limited to suppliers, contractors, customers, agencies engaging with Aquatic Achievers in any capacity is bound by this Privacy & Media Policy.

Managing Information

What we collect

We collect information that is only relevant to the services we provide as a business. We may collect information from people engaging with Aquatic Achievers. We collect information from our:

- Team
- Customers
- Prospective team members
- Suppliers and vendors
- Community partners

We only do this by lawful means to help us run our business.

The main way we collect information about you is when you give it to us directly. However sometimes we use third party tools and services, some of which use cookies. These tools and services include systems like:

- Booking systems
- Email programs
- Analytics
- Specialist consultants
- Financial systems
- People systems

As a stakeholder of Aquatic Achievers, it is up to you how much information you would like to provide. However, if you do not wish to provide certain information requested by us this may limit our ability to engage with you and carry out our relationship effectively. If you happen to provide someone else information for any reason, we do require their consent. Every customer has the option to stop receiving information from us at any time they choose.

How we manage information

We have systems, processes, and procedures in place to protect information from misuse, interference, loss and from unauthorised access, modification, or disclosure.

We aim to keep personal information accurate, up to date and protected. Our team will take all reasonable steps to confirm identity but if we are unsure, they may request additional proof. To further ensure privacy, we will periodically securely dispose of data we no longer require.

In an unlikely situation it may arise where personal information is required and disclosed for an emergency or is required or authorised by law or law enforcement. Aquatic Achievers will not otherwise give your personal information without consent unless one of these exceptions under the Australian Privacy Principles applies.

To manage information we collect, we may use service providers with cloud-based hosting facilities that are located outside of Australia. When we engage those service providers we ascertain if they are also subject to Australian privacy law and/or take steps to ensure our service providers only use the personal information to provide services to use and keep it confidential.

How we manage information

If you have a query or complain about how we manage your personal information or would like to know more please contact us:

Via post:
Aquatic Achievers
PO Box 532
Paddington Q 4064

Via email:
hello@aquaticachievers.com.au

For further information about privacy, visit the Australian Federal Privacy Commissioners website www.privacy.gov.au

Media

For the purposes of this policy, media is defined as the collection of photographs, video, and audio. For a variety of purposes, we collect media in places such as:

- in our centres (e.g., operations, lessons).
- at our events (e.g., Endurance Week, Gold1km, Safety Week).
- within our community (e.g., Charity Partner events).

Media use

Media use may include, but not limited to:

- Signage
- Brochures / Flyers

- News articles
- Social media
- Video content
- Advertisements (radio / television)
- Recruitment campaigns

Names will not be used in any above promotions, unless with the written permission by the subject or, in the case of a child, by the parent / caregiver. Names will only be used in giveaway promotions, however, will only use first or last name to reduce identifiability.

Identifiable media

In cases where we wish to use close up images or a photograph/video that focuses on a child or parent (as opposed to group, scenic or facility shots) we will always obtain written consent from the relevant parties.

Whilst Aquatic Achievers retains ownership of this media and the right to use it, any request from our stakeholders to remove images from our media will be done so immediately.

Aquatic Achievers owns all intellectual property rights to the media and company branding created or collected by an approved contractor, or on a company supplied / maintained device.

Agreements

Customer Media & Privacy Agreement

As we welcome our customers to take photography or video of their child at swimming lessons, we do so with the following agreements in place:

- You may only photograph/video children you are responsible for. No other children should be identifiable in the photography/video, including background without the express permission of the parent / caregiver of those child/children.
- You may not take photos or videos in the change rooms, change table areas, bathrooms, or shower areas.
- You accept that teachers, children, parents / caregivers have the right not to be photographed / videoed if they request.
- You may not film large portions of / or the entire lessons due to intellectual property considerations.
- If you share your media with Aquatic Achievers, you agree that Aquatic Achievers can reuse this material for promotional purposes.
- You accept that we reserve the right to inspect, stop or delete any photo / video if we suspect it to be inappropriate.
- Where you are concerned with photo / video being taken by another person please raise this us immediately. Once raised with our team this will be addressed using established procedures to protect your privacy.

3rd Party (Contractor / Consultant / Supplier) Media & Privacy Agreement

As we welcome 3rd parties onto our premises, we do so with the following agreements in place:

- You will only capture media of what is required for you to fulfill your work as per scope, brief or description.
- You accept that we reserve the right to inspect, stop or delete any images / video material if we suspect this to be inappropriate.

Team Member Media & Privacy Agreement

Team members may be asked to engage in the creation or management of media. This is to be done with the following agreements in place:

- Team members need to know and adhere to the Code of Conduct, Safeguarding Children and Young People Policy, Safeguarding Children and Young People Code of Conduct Policy.
- Team members should be mindful of the effect their actions may have on their personal reputation as well as Aquatic Achievers' brand reputation.
- Team members should not use personal devices to create media during working hours, even if they are requested to do so by a parent / caregiver. General purpose media created during centre events (or similar) should only be captured on a company device, and with the relevant consent.
- Team members are not to publish, or disclose any information that is considered confidential, or sensitive to Aquatic Achievers' intellectual property or operations without prior consent.
- Team members should not post images of customers, current or former employees, 3rd parties, without the relevant consent. Additionally, team members require relevant consent to use a 3rd parties copyrighted material, trademarks, service marks or other intellectual property.

Supporting Resources

- Privacy Act 1988
- Code of Conduct
- Safeguarding Children & Young People Policy
- Safeguarding Children & Young People Code of Conduct Policy
- Safeguarding Children & Young People Incident Management Policy
- Safeguarding Children & Young People Reporting Policy

Review and Approval

This Policy will be reviewed every 3 years, or more frequently as required. Any significant proposed changes are to be approved by Aquatic Achievers Board and/or General Manager.

Approved by:



Rob Macfarlane
General Manager

This document was reviewed and approved by the General Manager on 16th March 2022