

Privacy Policy

PURPOSE

This policy has been developed in accordance with the Australian Privacy Principles (APPs). It describes how the Western Australian Institute of Sport (WAIS) protects the personal information it holds and complies with the *Privacy Act 1988* (Commonwealth).

SCOPE

This policy applies to the personal information collected and held by WAIS.

POLICY

1. The working environment at WAIS promotes secure information requests and handles confidential information in accordance with the Australian Privacy Principles.
2. We act efficiently on any privacy complaints or issues that may arise.

The purposes for which we collect, hold, use and disclose personal information

3. WAIS primary purpose is to enable Western Australian athletes to achieve international sporting success. Our services and activities in relation to this policy include:
 - a) the development and coaching of elite athletes;
 - b) providing medical, financial, social or other support to athletes as required;
 - c) sports science research;
 - d) the development and education of students; and
 - e) providing education and sports information e.g. integrity in sport, anti-doping education.

The kinds of personal information that we collect and hold

4. In undertaking our activities we collect personal information. The personal information that we hold will depend on the nature of the activity or service. It may include, but is not limited to, a person's name, contact details, date of birth, occupation, family background, training and medical information, and financial records.
5. We only collect personal information to the extent that it is relevant for the relationship we have with that person.
6. We also hold sensitive information, for example about an employee or athlete. This may include information about health, disability, racial or ethnic origin, criminal convictions, personnel files, employment histories and tax file numbers.
7. The *Privacy Act 1988* (Cth) places restrictions on collecting sensitive personal information about people. We may collect sensitive information when:
 - a) providing sport services to persons (for example to an athlete)
 - b) providing health services to persons (for example to an athlete)
 - c) assessing eligibility for employment (potential or existing employees, e.g. qualification checks, Working with Children Checks)
 - d) for the purpose of maintaining the employer/employee relationship
 - e) for the purpose of meeting legal employment obligations.
8. If we conduct online collaboration, social media or market research, we may also ask for public opinions about our services and staff. We will treat these opinions as personal information in accordance with the APPs if they contain personally identifiable information.

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How we collect and hold personal information

9. If it is reasonable and practical to do so, we will collect personal information directly from the persons concerned and with their consent. This may be through application forms, over the telephone, via the internet or in person.
10. We may also need to collect personal information from other people and organisations. This information is collected with the person's consent, except for in circumstances allowed for by legislation. Sometimes this may happen without direct involvement. Some examples of people or organisations that we may collect personal information about persons from are:
 - a) state and national sporting organisations
 - b) publicly available sources of information
 - c) a person's representatives (such as a parent, coach, medical practitioner, legal advisor)
 - d) a person's employer
 - e) government agencies and statutory authorities
 - f) law enforcement agencies.
11. So that we can better tailor information and services to individual needs, when we send email messages, we may use technology to identify people who have opened an email or used the links within the email.
12. If people log onto our intranet/extranet services, information will be collected from them to confirm their identity.
13. We hold the information we collect on electronic systems and, where appropriate, in paper format. We have an information management system that complies with archival standards.
14. We hold our information on a cloud-based system. Where third-party cloud services are used the service will have been subject to WAIS risk assessment and be compliant with the privacy and security standards required by WAIS in protecting personal information.

When we will not need to collect personal information

15. Depending on the nature of a person's relationship with WAIS, they may not need to personally identify themselves. People generally have a right to pseudonymity or anonymity when dealing with us, unless:
 - a) we are required or authorised by or under an Australian law, or a court/tribunal order to deal with individuals who have identified themselves;
 - b) it is impractical to deal with individuals who have not identified themselves; and
 - c) the person is receiving a service or financial benefit from WAIS which necessitates assurance that the service or monies are being directed to an identified person.

How we keep personal information accurate and up-to-date

16. We aim to maintain the quality of our information holdings by taking reasonable administrative and technical steps to make sure that the information collected, used and disclosed is accurate, complete and up-to-date. For example, we employ audit and access control functions within our ICT systems to ensure information is not lost or damaged and conduct ongoing reviews of our holdings to ensure information currency.

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How we keep information and data secure

17. We commission and use up-to-date techniques and processes to protect personal information from misuse, loss and unauthorised access, modification or disclosure.
18. Paper documents are protected from unauthorised access or use through the various physical security systems we have at our premises. We also maintain or procure up-to-date computer and network security systems with appropriate firewalls, access controls and passwords to protect personal information held digitally.
19. The only people who have access to personal information are WAIS employees, those staff accredited by partner sport organisations, and those who perform services for WAIS who need personal information to do their jobs. All WAIS employees are made aware of good privacy practices and are bound by the WAIS Staff Code of Conduct to not misuse personal information. Those who perform services on our behalf are also bound by contractual agreements that include privacy clauses.
20. If we no longer require an individual's personal information, we will take reasonable steps to destroy it in a secure manner or remove identifying features from it. This is subject to any legal obligation that requires us to keep information for a certain period of time.

When we would provide personal information to others

21. We may provide personal information to external organisations. Generally, these are organisations that help us conduct our programs and activities. These organisations may include:
 - a) sport partners
 - b) government agencies and law enforcement agencies
 - c) cloud-based services that host WAIS data on their servers
 - d) authorised representatives of WAIS
 - e) superannuation funds
 - f) our accountants, auditors or lawyers
 - g) a person's representatives, for example a parent, coach, medical practitioner or legal adviser.
22. We aim to work collaboratively with a range of sport organisations (including state and national sporting organisations, other state Sport Institutes and Academies of Sport, and state and federal government departments and statutory authorities) to deliver our programs. This collaboration includes using shared information holding systems and sharing information which was collected for the primary purpose of delivering sport services. Where we share personal information we will do so where the system and the organisation meets our privacy expectations.
23. We strive to limit the information we provide to other external organisations to what they need to provide their services to us, or to provide services to our athletes. We strive to ensure that any organisation we contract with:
 - a) meets the privacy standards required by WAIS in protecting personal information and complies with the *Privacy Act 1988* (Cth) or if overseas, a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the *Privacy Act 1988* (Cth); and
 - b) uses the personal information provided only for the purposes of the specific service being provided to WAIS, and for no other purpose.

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24. We may also need to provide personal information to external parties where:
- the information relates to a sports drug and safety matter or is otherwise relevant to the performance of the functions of Sport Integrity Australia and as such may be provided to the Sport Integrity Australia;
 - we are required to do so by law, or have a public duty to do so. For example, a Court, a regulator (such as the Australian Taxation Office) or the police can compel us to disclose personal information to them; or
 - people have expressly consented to their personal information being supplied to others for particular purposes .

Disclosure of personal information to overseas recipients

25. We seek to limit, where possible, the disclosure of personal information to overseas recipients.

However, we provide services to Western Australian athletes throughout the world, which at times requires personal and/or sensitive personal information to be disclosed overseas.

26. We may also need to provide personal information to overseas recipients where:
- the information relates to providing information to an international sporting organisation (for example the IOC, FINA, IAAF) for the purposes of administering or assisting sport and sporting competition
 - the information relates to an anti-doping and/or safety matter or is otherwise relevant to the functions of the World Anti-Doping Authority
 - the information is provided in the management of travel or logistics for administrating staff, athletes and teams
 - a person has expressly consented to their personal information being supplied to overseas recipients.

Access to personal information and correction of that information

27. Any person who believes that WAIS holds personal information about them may contact us to seek access to that information in accordance with APP 12 – Access to Personal Information.

28. If after accessing information held about any person, they consider that it is inaccurate, out-of-date, incomplete, irrelevant or misleading for the purposes for which it is held, then they may request that we amend it in accordance with APP 13 – Correction of Personal Information.

29. In the first instance, a person can request access to their personal information by contacting WAIS.

By post:

Corporate Services Director
 Western Australian Institute of Sport
 PO Box 139
 CLAREMONT WA 6910

Email:

wais@wais.org.au with the subject: “Information Access Request”

30. We may not always be able to provide access to all the personal information we hold about a person. For example, we may not be able to provide access to information that would reveal personal information about another person.

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Notifiable data breaches

31. A data breach is when personal information an organisation holds is lost or subjected to unauthorised access or disclosure. For example, when:
- a device with personal information is lost or stolen
 - a database with personal information is hacked
 - personal information is mistakenly given to the wrong person.

Data breaches of personal information can cause significant harm to a person, whether that is harm to their physical or mental wellbeing, financial loss or damage to their reputation.

32. We comply with the Notifiable Data Breaches Scheme, and will notify affected individuals and the Office of the Australian Information Commissioner when a data breach is likely to result in serious harm.

How we handle privacy complaints

33. We will be efficient and fair when investigating and responding to any privacy complaints.
34. All complaints are managed in accordance with our Complaints and Feedback Policy.
35. Any privacy complaints received by WAIS must be in writing and will be initially investigated by the WAIS Privacy Officer, and will be escalated as required. We will respond to all complaints within a reasonable time period appropriate to the specific complaint.
36. Any person may also complain to the Australian Privacy Commissioner who may investigate our actions. The Commonwealth Ombudsman may also investigate complaints about our actions.

Website Privacy Statement

37. We are committed to protecting online privacy.
38. We record visits to our website and log the following information for statistical purposes:
- user's server or proxy address
 - pages visited
 - date/time/length of the visit
 - files requested.
39. The information is used to analyse our server traffic. No attempt will be made to identify users or their browsing activities except where authorised by law. For example in the event of an investigation, a law enforcement agency may exercise their legal authority to inspect the internet service provider's logs.
40. If you send us an email message we will record your contact details (in accordance with record keeping standards). This information will only be used for the purpose for which you have provided it. We will not use your email for any other purpose and will not disclose it without your consent except where such use or disclosure is permitted under an exception provided in the Privacy Act 1988 (Cth).
41. As a user, you need to be aware of inherent risks associated with the transmission of information via the Internet. If you have concerns in this regard, we have other ways of obtaining and providing information. Normal mail and telephone facilities are available.

FEEDBACK AND CONTINUOUS IMPROVEMENT

42. We actively seek feedback on our policies and procedures from staff, contractors, athletes and athletes' families.

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43. Any changes to policies or procedures and feedback received will feed into our continuous improvement process.

REVIEW

44. This policy will be reviewed every three years. If at any time the policy is no longer appropriate in its current form, it will be reviewed immediately.

45. Any necessary revisions will be made in consultation with stakeholders.

LEGISLATION AND FRAMEWORKS

Privacy Act 1988 (Commonwealth)

RELATED DOCUMENTS

The following documents support the implementation of this policy:

Information Management Policy

Data Governance Policy

ICT Acceptable Use Policy

Complaints and Feedback Policy

VERSION HISTORY

Version	Submitted By	Date	Approved By	Date	Details
1.6			Corporate Services Manager	January 2021	Policy Updated
1.7			Corporate Services Manager	February 2022	Minor revisions to improve readability and update titles.
2.0	Corporate Services Director	20/06/2025	CEO	05/07/2025	Policy updated to reflect current practices.

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