

## Privacy Policy

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Responsible Person	Executive Manager, People & Business Operations
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### 1 Introduction

Geelong Regional Library Corporation (**GRLC**) is committed to protecting an individual's right to privacy and, accordingly, adhering to its obligations under the *Privacy and Data Protection Act 2014 (Vic)* and *Health Records Act 2001 (Vic)* (**the Acts**).

### 2 Purpose

GRLC has the purpose and function of delivering library services on behalf of Borough of Queenscliffe, City of Greater Geelong, Colac Otway Shire, Golden Plains Shire and Surf Coast Shire.

This policy outlines how GRLC will, when furthering this purpose and performing this function, comply with the Acts and, in particular, how it will comply with the Information Privacy Principles (IPPs) and Health Privacy Principles (HPPs). Its purpose is to inform individuals about GRLC's obligations and information privacy practices, and outline the principles that will guide GRLC in relation to:

- responsible collection and management of personal information;
- providing individuals with the right to access their personal information;
- providing individuals with the right to make corrections to their personal information;
- handling queries and complaints about privacy; and
- balancing the public interest in the free flow of information with the public interest in protecting the privacy of personal information.

All employees and volunteers working for the GRLC are required, and contractors/agents to the GRLC are requested, to comply with this policy.

### 3 Scope

The scope of this policy includes personal information of people both internal and external to GRLC.

The policy applies to all employees of GRLC. External contractors that have been engaged to provide a service or function on behalf of GRLC will have the same obligations as GRLC

under this policy.

## 4 Definitions

The Acts regulate how public bodies such as GRLC handle personal, sensitive and health information.

### 4.1 Personal Information

Personal information is information or opinions (however recorded and whether true or not) about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. Examples of personal information include a person's name, sex, date of birth, address, financial details, marital status, and education and employment history. Sensitive information is a subset of personal information, and includes information such as an individual's racial or ethnic origin, political opinions, trade union membership, philosophical or religious belief, sexual preferences or criminal record.

### 4.2 Health Information

Health Information is information or opinions about the physical, mental or psychological health of an individual, the disability of an individual or a health service provided or to be provided to an individual.

### 4.3 Closed Circuit Television (CCTV)

CCTV is a surveillance system in which a number of cameras are connected through a closed circuit. The footage taken by the cameras is sent to a television monitor or recorder. CCTV systems consist of cameras, monitors, recorders, interconnecting hardware and support infrastructure.

### 4.4 Technology Resources

Technology Resources include (among others) software applications, third party social networking and eResources platforms, and computer hardware resources.

### 4.5 Information Handled by or on behalf of GRLC

Personal information handled by or on behalf of GRLC may include:

- a membership or employee number;
- name and address;
- telephone number(s);
- email address(es);
- postal address; and

- date of birth.

Such personal information is required for membership of GRLC.

A library record may include personal information about a member, such as:

- communication preferences;
- any library items borrowed;
- fines or lost/damaged book accounts;
- holds/reservations placed;
- carer or emergency contacts;
- appropriate parent or guardian details in the case of child members; and
- suspensions/cancellations of membership and the reasons for this.

Health information handled by or on behalf of GRLC may include:

- general information about illness or disabilities that may limit access to library services;
- a member's ability to carry library items;
- a member's access to transport or technology; and
- a medical certificate or case worker's referral to support a member's eligibility for the Home Library Service.

GRLC may also:

- capture and/or retain the images of individuals, including through its use of CCTV systems.
- monitor, access and retain the internet browsing history of a library services user.

## **5 Collection of Personal and Health Information**

GRLC collects personal information that is necessary for it to perform its function and deliver library services, including but not limited to:

- engaging employees, volunteers, contractors, partners and service providers;
- dealing with user registrations, visitors or potential visitors, general enquiries, orders and library operations;
- accessing the library collections, whether in person, online or the Home Library Service;
- accessioning records into the library collection;

- providing tickets to paid and free events, participation in market research, competitions, promotions and surveys;
- research, educational programs and tours;
- fundraising, membership and related transactions and administration;
- obtaining feedback or responding to complaints;
- commercial management and venue hire;
- permission to record and publish still photography, video and audio;
- recording and responding to online interactions between GRLC and others;
- receiving and providing information about library events, programs and activities;
- receiving information from and providing information to GRLC member councils;  
and
- provision of home library services.

Personal information may be collected in any form, including electronic form.

Health information may be collected where necessary to support the provision of library services for members of the community who have difficulty accessing their public library. This includes but is not limited to:

- General information about an illnesses or disabilities (either temporary, recurring or permanent) that may limit physical access to the library;
- Ability to carry library items;
- Access to transport and technology;
- Details of carers, case workers or emergency contacts; and
- A risk assessment of a client's residence.

When collecting personal or health information, GRLC will take practical and reasonable steps to ensure that individuals are made aware of:

- the reasons for collecting the information;
- the types of individuals or organisations to which GRLC might disclose this information;
- the rights of individuals to access their personal information;
- whether any law requires the collection of the information;
- the consequences (if any) of not providing the information; and
- GRLC's contact details.

Where possible, GRLC only collects personal information from the individual concerned. It will only collect sensitive information with the consent of the relevant individual or where applicable legislation allows that collection.

## **6 Use and Disclosure**

GRLC uses personal information collected from/about members of the public to provide library services and carry out programmes and activities in a safe and secure environment. It only uses health information for the purpose for which that health information was provided, for example to provide advice on library services that could be provided to a person during illness or, in relation to staff, for employment purposes, such as processing leave applications.

GRLC will only use or disclose personal information:

- for the purpose for which it was collected;
- for a secondary purpose related to the purpose for which the personal information or health information was collected, where the individual would reasonably expect the personal information or health information to be used or disclosed;
- where the GRLC is required or authorised to do so by law, such as where Victoria Police requests information for the purpose of an investigation; or
- where GRLC believes there is a serious and imminent threat to an individual's or the public's health, welfare or safety.

Occasionally, GRLC may be authorised by law to provide personal information or health information to others for other purposes, such as to the Australian Taxation Office for employment purposes. In other cases an individual's consent may be sought to use or provide personal information or health information to others.

GRLC uses membership details to create statistics, which allow for planning to improve or extend library services, and to meet changes in demand for services. Individuals are not identified by name or address when compiling this statistical information.

## **7 Data Quality**

GRLC will take reasonable steps to ensure that any personal information and health information held is accurate, complete and up-to-date. It does, however, rely upon individuals to provide accurate and current information to GRLC in the first instance, and to notify GRLC when circumstances or details change.

## **8 Storage and Protection of Information**

GRLC has security measures aimed at protecting personal information and health information from misuse, loss, unauthorized access or disclosure. These security measures include taking reasonable steps to protect databases and hard copy records of members' and staff personal and health information.

GRLC will take reasonable steps to lawfully and responsibly destroy or permanently de-

identify personal and health information when it is no longer needed for any purpose, subject to compliance with any applicable law (including but not limited to the *Public Records Act 1973*).

## **9 Individual Access to Information**

Individuals whose personal information or health information is held by GRLC have a right to access and correct that information.

Simple requests that involve only easily retrievable information of a small volume may be dealt with informally. Requests that involve information about commercial activities or which in some way affect the privacy of another individual, or other more complex requests for access, may need to be dealt with through a request made under the *Freedom of Information Act 1982 (Vic)*.

## **10 Unique Identifiers**

GRLC will only assign a unique identifier to individuals where it is necessary to carry out one of its functions or services efficiently (e.g. a GRLC registration number, credit card details or payroll number).

## **11 Anonymous Transactions and Data Use**

Wherever practicable, GRLC will allow individuals not to disclose their identities when entering a transaction with GRLC. GRLC will advise individuals of any limitations of access to its collections as a result of choosing to transact anonymously.

GRLC collects individual data for statistical analysis and website usage purposes, for website administration and maintenance, and to improve and develop websites and applications to better meet user needs.

No attempt will be made to identify individuals and their browsing activities, except in the proper investigation of suspected breaches of relevant GRLC entry and services policies, or where GRLC is required by law.

### **11.1 Clickstream data**

When users visit GRLC websites, web servers automatically capture and log data, which includes:

- IP address;
- top-level domain name (for example, .com, .au, .gov);
- date and time of site visit;
- pages accessed;
- files downloaded;

- address of last site visited; and
- browser type and version.

## 11.2 Cookies

GRLC uses cookies to automatically identify a user's computer and record aspects of the visit. GRLC uses cookies for some parts of its website(s) to assist in making the user's experience easier and more efficient.

## 11.3 Analytics

GRLC uses analytics tools, such as Google Analytics and Hootsuite, for the capture and provision of website statistics. These services use cookies. In addition, some tools such as Google Analytics use a 'web beacon' or transparent image. Web beacons are simply a convenient way of gathering the statistics and managing cookies. Users can 'opt out' of Google Analytics if they use the opt-out service provided by Google.

## 12 Transfer of Information Interstate or Overseas

If GRLC transfers the personal information it collects outside Victoria, it will take care to ensure that the transfer of information complies with the relevant legislative requirements relating to transborder data flows. GRLC may, in some circumstances for the necessary performance of its functions, transfer personal information or information collected from individuals outside Victoria to the servers of third-party organisations.

## 13 Complaints Procedures

GRLC undertakes to resolve privacy complaints in a timely, fair and reasoned way.

If any persons feel aggrieved by GRLC's handling of personal information about themselves, they may make a written complaint to the Privacy Officer (Executive Manager, People and Business Operations) or the Chief Executive Officer.

If a person remains dissatisfied with the response by GRLC, that person may make a complaint to the Information Commissioner about misuse of personal information or the Health Complaints Commissioner about health information.

## 14 Regular Review

This policy will be reviewed every two years, following significant incidents if they occur, or after any relevant legislative changes (whichever occurs first).

## 15 Useful Contact Details

### 15.1 GRLC Privacy Officer (Executive Manager, People & Business Operations)

Geelong Regional Library Corporation  
51 Little Malop Street  
Geelong Victoria 3220  
Tel: 03 4201 0600  
Email: [info@grlc.vic.gov.au](mailto:info@grlc.vic.gov.au)

Information Commissioner  
PO Box 24274  
Melbourne Victoria 3001  
Tel: 1300 006 842  
Email: [enquiries@ovic.vic.gov.au](mailto:enquiries@ovic.vic.gov.au)

Health Complaints Commissioner  
Level 26, 570 Bourke Street  
Melbourne Victoria 3000  
Tel: 1300 582 113  
Contact: <https://hcc.vic.gov.au/contact>