**Right to Disconnect Policy Template**

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| **Title**: Right to Disconnect Policy Template  | **Department:**  |
| **Policy No:** INSERT CLUB POLICY NUMBER | **Version:** Insert version no. |
| **Effective Date:** Click to enter date | **Approved Date:** Click to enter date |
| **Revision Date:** Click to enter date | **Approved by:** Position title |

# Purpose

Surf Life Saving Queensland (SLSQ) is committed to protecting the privacy of its members, volunteers, employees and stakeholders. This policy outlines how SLSQ collects, uses, stores, and discloses personal information in line with the Privacy Act 1988 (Cth), Australian Privacy Principles (APPs), and SLSA Policy 6.02 – Privacy.

By interacting with SLSQ, including through membership, events, or services, individuals consent to the handling of their personal information as described in this policy.

This policy ensures:

* Transparency in the collection and use of personal information.
* Alignment with national privacy legislation and SLSA policy.
* Clear processes for accessing and correcting personal data.
* Guidance for managing complaints and breaches.

# Application

This policy applies to:

* All Club members, employees, volunteers, and committee members.
* Personal and sensitive information collected through forms, SurfGuard, emails, Club systems, websites, social media, and events.
* Any third-party providers acting on behalf of the Club.

**Definitions:**

For the purposes of this policy, the following terms are defined as:

* Personal Information: Information or an opinion about an identified individual, or an individual who is reasonably identifiable. Examples include names, addresses, phone numbers, email addresses, birth dates and membership history.
* Sensitive Information: A subset of personal information which includes details such as health information, criminal history, racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual orientation or membership in a trade or professional association. This type of information is afforded a higher level of privacy protection under the law.
* APPs (Australian Privacy Principles): The 13 principles set out in the *Privacy Act 1988 (Cth)* that regulate the collection, use, storage and disclosure of personal information by organisations.
* Data Breach: An incident in which personal information is lost or subject to unauthorised access, disclosure, modification or misuse.
* Notifiable Data Breach Scheme (NDBS): A mandatory legal obligation under the *Privacy Act 1988* which requires organisations to notify affected individuals and the Office of the Australian Information Commissioner (OAIC) of eligible data breaches likely to result in serious harm.
* OAIC (Office of the Australian Information Commissioner): The independent national regulator for privacy and data protection in Australia.
* Third-Party Provider: Any external organisation, platform, or contractor engaged by SLSQ that may collect, process or store personal information on behalf of SLSQ for a specific purpose (e.g., event registrations, surveys, IT services).
* Support Person: An individual chosen by the person whose data is collected, who may be present during meetings or investigations involving privacy matters. They are not authorised to act on behalf of the individual unless formally designated.
* Anonymity or Pseudonymity: The option for an individual to engage with SLSQ without revealing their identity, where lawful and practical.
* Consent: The express or implied permission provided by an individual for SLSQ to collect, use, or disclose their personal or sensitive information for an identified purpose.

# Policy

**Collection of Personal Information**

The Club may collect:

* Contact details, date of birth, emergency contacts, qualifications and employment information
* Sensitive information such as health/medical, criminal history or cultural background (with consent).
* Information via SurfGuard, application forms, emails, verbal interactions or digital platforms.

Information is collected when individuals:

* Apply for or renew membership.
* Enrol in courses or training
* Participate in lifesaving activities, competitions or carnivals
* Interact with digital platforms (e.g., website, app, social media) Submit incident reports, complaints, or applications.
* Apply for employment, Volunteer Committees roles or Nominations for Life Membership
* Submit event RSVPs/registrations, assessments, applications or evaluation forms via online portals, paper forms, or third-party systems.
* Screening and records related to the Working with Children Checks (Blue Card) and duty of care responsibilities under WHS and Child Safe Standards.

The Club will always inform individuals when collecting personal data, the purpose for collection, and how it will be used. Appendix 1 is an overarching template.

**Use and Disclosure of Information**

The Club may use or disclose personal information to:

* Manage membership, training, events, and emergency response activities.
* Communicate with members and stakeholders (e.g., newsletters, updates).
* Conduct research and reporting.
* Fulfil legal, regulatory, or safety obligations (e.g., child safety, WHS) or as permitted under the Privacy Act.
* Coordinate with SLSA, Clubs, Branches, Supporters’ Clubs, or government agencies as required.

The Club will not disclose personal information to overseas recipients unless:

* Required to deliver SLS services through affiliated entities, and
* Privacy protections equivalent to Australian law are in place, or
* The individual provides written consent.

Failure to provide the requested information may impact your ability to participate in Surf Life Saving programs, competitions, or to apply for employment or volunteer roles with SLSA or its affiliated entities. Where it is impractical for an SLS Entity to proceed without the required information or consents, the entity may be unable to engage with you.

**Marketing and Communication Preferences**

The Club may use personal information to send members communications about activities, events and updates. Individuals may opt out at any time by using unsubscribe links or contacting the club.

**Dealing with SLSQ Anonymously**

Where lawful and practical, individuals may interact anonymously or using a pseudonym. However, this may limit the clubs ability to provide services, respond to enquiries, or process complaints effectively.

**Photographs and Media**

Images and videos captured during activities may be used for promotional, educational and reporting purposes. Individuals may request to withdraw or restrict consent for media use by contacting the club.

**Website and Digital Technologies**

The Club websites may collect technical data (e.g., IP address, browser type) through cookies and analytics to improve user experience. External links provided by Club/ SLSQ are not governed by this policy and users are encouraged to review third-party privacy terms.

**Third-Party Systems & Declaration**

The Club Clubs that use third-party platforms (e.g., survey tools, event registration) to deliver services. Any such use must include the following privacy declaration in appendix 2.

**Storage and Security**

The Club protects personal data using:

* Secure platforms (e.g., SurfGuard) and restricted access controls.
* Data encryption, firewalls, and password protocols.
* Staff training and documented handling procedures.

Retention and destruction

* Personal information will be securely deleted or de-identified when no longer required for the purpose for which it was collected, in accordance with the Privacy Act 1988 (Cth).
* Other types of records (such as employment records) will be retained and disposed of in accordance with a Document Retention and Destruction Policy.

In accordance with the Notifiable Data Breaches Scheme (NDBS), SLSQ will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) in the event of a serious breach.

**Access and Correction of Personal Information**

Individuals can:

* Request access to their personal information held by Club
* Correct inaccurate or outdated information.

Requests can be made in writing to INSTERT NAME HERE AND CONTACT. The Club will respond within 30 days.

**Privacy Complaints and Enquiries**

If an individual believes their privacy has been breached, they may lodge a complaint by contacting the Governance team by:

Surf Life Saving Queensland
18 Manning Street, South Brisbane QLD 4101
Email: Complaints@lifesaving.com.au
Phone: +61 7 3846 8000

SLSQ will:

* Respond to your complaint within 30 days and try to resolve it within 90 days.
* If we are unable to resolve your complaint within this time, or you are unhappy with the outcome, you can contact the Office of Australian Information Commissioner via its enquiries line 1300 363 992 or website http://www.oaic.gov.au/ to lodge a complaint.

**Related Policy Documents:**

* Surf Life Saving Australia (SLSA) Privacy Policy
* SLSQ Privacy Policy
* SLSQ Code of Conduct
* Australian Privacy Act 1988 (Cth) and Australian Privacy Principles

**Appendix 1 - Privacy Collection Notice Template**

*Privacy Collection Statement*

*The Club is committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth).*

*The personal information collected in this (form/application/registration) is required for the purpose of:*

* *(Insert specific purpose e.g., processing your membership, registering your attendance, administering your assessment, etc.)*
* *Communicating important information relating to Surf Life Saving programs, activities, and services*
* *Meeting our legal and regulatory obligations (e.g., Work Health and Safety, child safety, training compliance)*

*Your information may be shared with affiliated Surf Life Saving entities, including Clubs, Branches, SLSA, and service providers, but only where necessary and in accordance with SLSQ’s Privacy Policy.*

*If you do not provide the required information, The Club may be unable to (e.g., process your registration, approve your participation, or respond to your enquiry).*

**Appendix 2 - Template Privacy Declaration for Third Party Systems**

“*Privacy: I understand that the information I have provided in this form is necessary for the proper management of this activity and for the administration of Surf Life Saving related activities in Australia.*

*The information is collected in accordance with the Privacy Policy*

*The Club may share my information with SLS affiliates in accordance with the Privacy Policy and it may also be used to notify me of other events, news, and to offer the provision of services, including by third-party providers, to me.*

*I understand that the Privacy Policy contains information about how I may access and request correction of my personal information held, or make a complaint about the handling of my personal information, and provides information about how a complaint will be dealt with. If the information is not provided, my application may be rejected or services may be unable to be provided to me.*

*I acknowledge that if I do not wish to receive promotional material from SLS sponsors and third parties I may advise in writing or via the opt-out process provided in the relevant communication.*