

Sydney Olympic Park Authority Policy

Policy Name	Privacy Management Plan
Policy No.	POL09/5
Department File No.	F08/570
Business Unit	Commercial Services
Officer Responsible	Privacy Coordinator
Approving Officer	Privacy Officer
Date of Approval	May 2002

Version	Review	Date	Approved By
1		May 2002	
2		July 2008	
3		November 2009	GM, Corporate & Commercial
3.1		June 2011	GM, Corporate & Commercial
3.2	Annual Review	November 2013	GM, Corporate & Commercial
4	Annual Review Privacy Coord	February 2012	GM, Corporate & Commercial
4.1	Annual Review Privacy Coord	February 2014	GM, Corporate & Commercial
4.2	Annual Review Privacy Coord	February 2015	GM, Corporate & Commercial
4.3	Annual Review Privacy Coord and Digital Marketing Manager	February 2016	Privacy Officer

Contents

1.	Who we are	3
2.	The purpose of this Plan.....	3
3.	Introduction to privacy at SOPA.....	3
4.	Main areas of operations	4
5.	Operations and Sustainability	4
6.	Commercial and Corporate.....	4
7.	Communications	4
8.	Accessing or amending your personal information	5
9.	The GIPA and Privacy Unit	5
10.	The Chief Executive Officer	6
11.	Inventory of signification information holdings	7
12.	Legislation and policies affecting privacy	10
13.	Other legislation regulating personal information and privacy	10
14.	How we handle privacy complaints.....	10
15.	The reviewing officer.....	11
16.	Extensions of time for lodgement.....	12
17.	The Internal Review process	12
18.	External Review by the Administrative Decisions Tribunal	13
19.	Strategies for implementing this Plan.....	13
20.	Related References	14
	Privacy Complaint (Internal Review Application) Form.....	1

1. Who we are

Sydney Olympic Park Authority (SOPA) is responsible for managing and developing the 640 hectares that comprise Sydney Olympic Park and maintaining it as a lasting legacy for the people of New South Wales. This includes the venue management of the Aquatic Centre, Athletic Centre, Archery Centre, Sports Centre, Sports Halls and Hockey Centre within the Park.

SOPA's functions include promoting, coordinating, organising, managing, undertaking, securing and conducting cultural, sporting, educational, commercial, tourist, recreational, entertainment and transport activities and facilities. The Authority is also charged with providing, operating and maintaining public transport facilities within the Park. The protection and enhancement of the natural and cultural heritage of the Park, particularly the parklands, is another key responsibility of the Authority.

2. The purpose of this Plan

Under s.33 of the Privacy and Personal Information Protection Act 1998 (PPIP Act), every public sector agency must have a Privacy Management Plan.

The purpose of this Privacy Management Plan is to demonstrate to members of the public how SOPA upholds and respects the privacy of our clients, staff and others about whom we hold personal information.

3. Introduction to privacy at SOPA

SOPA takes the privacy of our staff and our clients seriously, and we will protect privacy with the use of this Privacy Management Plan as a reference and guidance tool.

As a NSW public sector agency, SOPA is regulated by the Privacy and Personal Information Protection Act 1998 (the PPIP Act) and the Health Records and Information Privacy Act 2001 (HRIP Act).

Both of these Acts are underpinned by what are termed 'privacy principles'. The PPIP Act covers personal information other than health information, and requires agencies to comply with 12 information protection principles (IPPs). Health information is regulated by a slightly different set of principles. Health information includes information about a person's disability, and health / disability services provided to them. There are 15 health privacy principles (HPPs) in the HRIP Act, with which SOPA must comply.

The IPPs and HPPs cover the full 'life cycle' of information, from the point of collection through to the point of disposal. They include obligations with respect to data security, data quality (accuracy) and rights of access and amendment to one's own personal information, as well as how personal information may be collected, used and disclosed.

There are exemptions to many of the privacy principles. Exemptions can be found in the two Acts themselves, and in Regulations, Privacy Codes and Public Interest Directions.

Both the PPIP Act and the HRIP Act contain criminal offence provisions applicable to staff and officers of SOPA who use or disclose personal information or health information without authority.

More information about how the IPPs and HPPs apply in practice at SOPA may be found in the SOPA Privacy Protocol, available from the Information and Privacy Commission or by contacting our GIPA and Privacy Unit (see below).

4. Main areas of operations

The Chief Executive Officer of SOPA is responsible to the Director General, Department of Education and Communities.

5. Operations and Sustainability

Operations and Sustainability team manages the public places and spaces at Sydney Olympic Park. These places include just over 500 hectares of the 640 hectare site. The Authority - as the 'place manager' is responsible for day-to-day management of the public places - including the delivery of public events, excursions and programs; the protection of ecosystems, heritage and environment; the conservation of energy, resources, species and habitat; the maintenance and replacement of buildings, facilities and landscape assets; the provision of a safe and secure public domain; organisation of traffic, transport, construction activity and people movement; monitoring of visitation and enhancement of the visitor experience; and generally coordinating the use and operation of the site.

6. Commercial and Corporate

Commercial and Corporate team manages the overall strategic direction and management of the government's interests in property and venue development; all related commercial arrangements; governance; organisational support functions and management of the Authority's venues (Aquatic Centre, Athletic Centre, Archery Centre, Sports Centre, Hockey Centre and Sports Halls).

7. Communications

Communications team is responsible for providing written and visual information to customers, visitors, staff, community, media and other stakeholders. These services include internal and external communication and promotion, advertising, public affairs and media liaison, government relations, community relations, ministerial correspondence, customer relations and research.

8. Accessing or amending your personal information

The types of personal information we hold about people is outlined below. You can ask SOPA to let you access and/or amend the personal information that we hold about you.

To make an access or amendment request, the SOPA Government Information (Public Access) and Privacy Coordinator may be contacted by telephone on 02 9714 7300 Email: gipa.privacy@sopa.nsw.gov.au

9. The GIPA and Privacy Unit

The SOPA GIPA and Privacy Unit is responsible for privacy management across SOPA, including:

- a) distribution of privacy material within SOPA, to both staff and clients;
- b) being the first point of contact for privacy complaints, privacy enquiries and 'access to information' requests;
- c) providing ad-hoc privacy advice to internal stakeholders;
- d) ensuring staff are trained in and aware of their privacy obligations;
- e) ensuring this Privacy Management Plan remains up to date and informing staff of any changes to the Plan;
- f) making a copy of this Plan available to the Privacy Commissioner, the public and all current and incoming staff;
- g) ensuring relevant privacy documents are consolidated and made available through SOPA intranet and internet sites; and
- h) managing significant privacy risks, such as by commissioning audits of operational areas or privacy impact assessments of new projects.
- i) The SOPA GIPA and Privacy Unit, in accordance with clause 6 of the Annual Reports (Departments) Regulation 2010, is to also ensure that SOPA's Annual Report includes:
 - j) a statement of the action taken by the agency in complying with the requirements of the PPIP and HRIP Acts; and
 - k) statistical details of any internal reviews conducted by or on behalf of the agency.

The SOPA GIPA and Privacy Unit is to review and update this Privacy Management Plan:

- a) if SOPA wishes to introduce a significant new collection of personal information; or
- b) if a privacy code or a direction of the Privacy Commissioner significantly modifies the application of the IPPs or HPPs to the operations of SOPA; or
- c) by the conclusion of the 2017-18 reporting year.

10. The Chief Executive Officer

With consideration of advice provided by the SOPA GIPA and Privacy Unit, may amend this Plan as necessary at any time. Types personal and health information held.

Employee records for staff of SOPA, including:

- a) payroll, attendance and leave records
- b) performance management and evaluation records
- c) training records
- d) workers compensation records
- e) occupational health and safety records, and
- f) records of gender, ethnicity and disability of employees for equal employment opportunity reporting purposes.
- g) Contact details for people such as:
 - h) members of the Health Club,
 - i) people who have enrolled in Swim School, Gymnastics Club, or other sporting programs,
 - j) school teachers who book school excursions to the Park,
 - k) people who have enquired about bookings events or Business Venue facilities within the Park,
 - l) people who book tours, activities, or artistic, cultural or educational workshops within the Park,
 - m) people who enter competitions run by SOPA, and

- n) people who subscribe to SOPA communications such as email newsletters and alerts.
- o) Correspondence records including:
- p) contact details of people who have written to SOPA about SOPA matters
- q) details of the nature of their correspondence
- r) copies of replies to correspondence, and
- s) records of who, if anyone, their correspondence was referred to.

Customer, supplier and related records including:

- a) membership information, including declared medical conditions, for members of the Health Club,
- b) enrolment / attendance information, including declared medical conditions, for people who have enrolled in Swim School, Gymnastics Club, athletics programs or other sporting programs,
- c) artists who submit applications for the Artists at the Armory program,
- d) students who have their art exhibited through the ARTEXPRESS or Operation Art programs,
- e) external suppliers who provide artistic, cultural or educational programs within the Park, and
- f) images and footage of people using Park facilities.

11. Inventory of signification information holdings

Name	Description
Aprimo CRM	A database holding the contact details and communication preferences of people who receive email or mailed communications from SOPA. These include people currently enrolled in sporting programs such as Swim School, members of the public who have subscribed (via a SOPA website or a paper form) to receive the “What’s On” e-newsletter or other notifications and offers, local residents or employees within the Park who receive “Park News” or community alerts about up-coming events, and people who have enquired about bookings events or Business Venue facilities within the Park. Aprimo CRM is used to manage the distribution of outgoing email and/or mail communications, according to

Name	Description
Centaman	<p>each person's preferences. Business Venues within the Park have limited access to Aprimo, to see the contact details and requirements of people who have enquired about their venue. Data is generated when customers 'click through' from an email to the website.</p> <p>A Point of Sale system used in some of the sports venues such as the Aquatic Centre, to record sales, manage venue hire and bookings, manage enrolment information (for example, Swim School classes), and membership information (for example, Health Club memberships). Some membership information held in Centaman will include photographs taken for membership cards (for example, some multi-visit swim passes and Health Club memberships).</p> <p>Basic contact information is regularly extracted from Centaman and imported into Aprimo CRM to facilitate email communications with members and other users of the sports venues; for example, to remind customers to re-enrol in Swim School for the next term.</p>
Events Perfect	<p>Data relating to the management of events at the Sports Centre, such as contact details of the person booking the event.</p>
Sports Halls / Sports Centre databases	<p>Data held in Excel spreadsheets, relating to bookings for indoor sporting facilities and Gymnastics Club; can include a flag to indicate a declared medical condition.</p>
Archery Centre database	<p>Data held in Excel spreadsheets, including contact details for Archery Club members, bookings for archery facilities, and enrolments in archery programs, including declared medical conditions.</p>
Athletic Centre database	<p>Data held in Excel spreadsheets, including contact details for commercial tenants within the Centre, and bookings for external events such as triathalons.</p>
Membership / enrolment forms	<p>Paper files are held on people who enrol for Swim School, Gymnastics Club and other sports programs such as Archery school holiday programs. These include declared medical conditions. Health Club membership information includes pre-exercise screening, declared medical conditions, emergency contact details, direct debit information and membership terms.</p>
Customer Feedback forms	<p>Data held in Excel spreadsheets by the General Manager of the Sporting Venues.</p>
Monster Skatepark customer records	<p>Customers of the Monster Skatepark may subscribe to email communications via the Monster website. Emails are generated directly from the Monster Skatepark customer database. Paper records are generated for each entry to the Skatepark, including a waiver form.</p>

Name	Description
Education Programs database	Data held in Excel spreadsheets, relating to school group bookings, and environmental youth programs.
Environmental Volunteer records	Records are kept about volunteers including their name and contact details, and declared medical conditions.
Complaints database	A spreadsheet used for managing complaints, and identifying trends.
Tenancy information	Information held about residential tenants, as the landlord of 12 cottages in Homebush West.
Lifestyle database	<p>Lifestyle is an exclusive member benefits program designed to enhance the lives of employees and residents of the Sydney Olympic Park area. Members receive discounted, priority and convenient access to a diverse range of facilities, services and events located in and around the Park.</p> <p>The Lifestyle CRM database holds details about Lifestyle members, including name and contact details. Information is also collected when purchases are made of limited items such as gift cards or movie tickets, or when members enter a Lunch League sports competition.</p> <p>Basic contact information is regularly extracted from the Lifestyle database and imported into Aprimo CRM to facilitate email communications with Lifestyle members.</p>
Social media content	SOPA-supplied content and user-generated content such as images, video and text may be posted on a number of social media sites, such as Facebook, YouTube and Twitter, to pages administered by SOPA.
Images	SOPA takes and commissions photographs and video footage of visitors to the Park.
CCTV footage	CCTV cameras operate across a number of SOPA sites, including in the car parks and sporting venues. CCTV footage may be disclosed to NSW Police, or to other parties such as under subpoena.
Incident reporting	Injury and incident reports are completed by security rangers who attend on-site at an incident, such as a car accident. Personal information collected can include details of motor vehicles, injured people, as well as witnesses. Reports may be disclosed to NSW Police, or to other parties such as under subpoena.
SAP	Financial system. Collects some personal information from customers when they pre-purchase parking for events via the SOPA website.
ADP Managed Payroll System	Payroll and leave management system.

Name	Description
TRIM	the Authority's records management system.

12. Legislation and policies affecting privacy

[Privacy and Personal Information Protection Act 1998 \(NSW\)](#)
[Privacy and Personal Information Protection Regulation 2014](#)
[Health Records & Information Privacy Act 2002 \(NSW\)](#)
[Health Records and Information Privacy Regulation 2012](#)
[Privacy Code of Practice \(General\) 2003](#)
[Direction on Information Transfers between Public Sector .. \(made under the Privacy and Personal Information Protection Act 1998 \(NSW\)\)](#)
[Workplace Surveillance Act 2005 No 47](#)
[Workplace Surveillance Regulation 2012](#)

13. Other legislation regulating personal information and privacy

[Government Information \(Public Access\) Act 2009 No 52](#)
[Government Information \(Public Access\) Regulation 2009](#)
[Public Interest Disclosures Act 1994 No 92](#)
[Public Interest Disclosures Regulation 2011](#)

14. How we handle privacy complaints

Any person may make a privacy complaint, by applying for an 'internal review' of the conduct they believe breaches a privacy principle (an IPP and/or an HPP).

Internal review is the process by which SOPA manages formal, written privacy complaints about how we have dealt with personal information or health information. All written complaints about privacy are considered to be an application for internal review, even if the applicant doesn't use the words 'internal review'.

By law, an application for internal review must:

- a) be in writing
- b) be addressed to SOPA or one of the sports venues managed by SOPA
- c) specify an address in Australia to which the applicant is to be notified after the completion of the review, and
- d) be lodged at SOPA within six months from the time the applicant first became aware of the conduct that they want reviewed.

SOPA encourages the use of the Internal Review Application Form, found at Appendix A to this Privacy Management Plan.

An application for internal review can be made on behalf of someone else.

Where the applicant is not literate in either English or their first language and where there is no other organisation making the application on their behalf, staff should help the person to write their application. Staff should use a professional interpreter, if necessary. Applications in other languages will be accepted and translated, and all acknowledgments and correspondence to the applicant will be translated.

Applications for internal review, or any written complaint about privacy, received at any of SOPA's offices, should be forwarded immediately to the GIPA and Privacy Unit.

15. The reviewing officer

The internal review will be conducted by a "reviewing officer", who must be:

- a) not involved in the conduct which is the subject of the complaint, and
- b) an employee or officer of SOPA, and
- c) qualified to deal with the subject matter of the complaint.

The default position is that SOPA's Privacy Officer will be the reviewing officer. However another person may be appointed by the SOPA GIPA and Privacy Unit, if:

- a) the Privacy Officer was involved in the conduct to be reviewed
- b) the person whose conduct is to be reviewed is in a particular position of influence over the Privacy Officer, by reason of their position or seniority
- c) the investigation will require expertise or particular skills not possessed by the Privacy Officer, or
- d) it is necessary to share workload or deal with the absence of the Privacy Officer.

It may also be necessary or appropriate to seek external specialist advice to inform decisions or findings of the internal review process, such as specialist investigative or legal / analytical advice. For example if the conduct complained of involves an alleged 'hacking' into a computer database, specialist computer forensics investigative skills may be required. However such advice cannot substitute for the review process itself, which must, by law, be conducted by an employee of SOPA.

The GIPA and Privacy Unit will determine whether any external specialist advice is required to assist the reviewing officer.

16. Extensions of time for lodgement

While the PPIP Act allows applicants six months to apply for an internal review from the time the applicant first becomes aware of the conduct, SOPA may accept late applications.

Possible acceptable reasons for delay may be:

- a) the applicant's ill-health or other reasons relating to capacity
- b) the applicant only recently becoming aware of his or her right to seek an internal review, or
- c) the applicant reasonably believing that he or she would suffer ill-effects as a result of making an application at an earlier time.

However late applications that, because of their age, cannot be investigated in a meaningful way will nonetheless be declined. In these cases, witnesses may no longer be available, documents may have been destroyed and memories may have faded.

Final decisions on the acceptance of late applicants will only be made by SOPA's GIPA and Privacy Unit. Where the decision is made not to accept an application because it is too old, the reason will be explained in a letter to the applicant.

17. The Internal Review process

When SOPA receives an internal review application the Privacy Officer will:

- send an acknowledgment letter to the applicant and advise that if the internal review is not completed within 60 days they have a right to seek a review of the conduct by the Administrative Decisions Tribunal, and
- send a letter to the NSW Privacy Commissioner with details of the application. A copy of the written complaint will also be provided to the Privacy Commissioner.

Internal reviews follow the process set out in the Office of the Privacy Commissioner NSW's Internal Review Checklist, available from <http://www.ipc.nsw.gov.au/checklist-privacy-internal-review-agencies>

When the internal review is completed, the reviewing officer will notify the applicant in writing of:

- a) the findings of the review
- b) the reasons for the finding, described in terms of the IPPs and/or HPPs

- c) any action we propose to take
- d) the reasons for the proposed action (or no action), and
- e) the applicant's entitlement to have the findings and the reasons for the findings reviewed by the Administrative Decisions Tribunal.

The reviewing officer will also send a copy of that letter to the Privacy Commissioner.

Statistical information about the number of internal reviews conducted must be maintained for SOPA's Annual Report.

18. External Review by the Administrative Decisions Tribunal

People may apply to the Administrative Decisions Tribunal for an external review of the conduct which was the subject of their earlier internal review application. The Tribunal may make orders requiring SOPA to:

- a) refrain from conduct or action which breaches an IPP, HPP or Code
- b) perform in compliance with an IPP, HPP or Code
- c) correct information disclosed by SOPA, or
- d) take steps to remedy loss or damage.

The Tribunal may also make an order requiring SOPA to pay damages of up to \$40,000 if the applicant has suffered financial loss or psychological or physical harm as a result of the conduct.

19. Strategies for implementing this Plan

This 2014 Plan supersedes previous versions of the SOPA Privacy Management Plan.

The process of developing this Plan included a review of privacy management activities across SOPA. As a result of the review, the following documents were developed as part of the 2013 review:

- a) Redevelopment of this Privacy Management Plan
- b) Development of SOPA Privacy Protocol, and
- c) Redevelopment of SOPA CCTV Protocol,

It is intended that this Plan will be reviewed every five years. This will include review of:

- a) policies that underpin privacy management practice and ensure compliance by SOPA with the requirements of the PPIP and HRIP Acts;
- b) practices and procedures to support the policies, including internal review procedures;
- c) the dissemination of those policies and practices to persons within the Authority;
- d) strategies for the following five years to enhance privacy management; and
- e) such other matters as are considered relevant by SOPA in relation to privacy and the protection of personal information held by SOPA.

20. Related References

Reference	Title	Responsible Officer
POL05/19	CCTV Code of Practice	Right to Information Officer
POL14/1	Privacy Protocol	Right to Information Officer
D14/4146	IPPs	Information and Privacy Commission
D14/4145	HPPs	Information and Privacy Commission
POL01/17	SOPA Code of Conduct (part of the NSW Office of Communities)	Manager, Human Resources
L05/534	Sydney Olympic Park Authority Act 2001	NSW Legislation
POL07/4	SOPA ISMS Acceptable Usage Policy	IT Manager

Privacy Complaint (Internal Review Application) Form

	Name of the agency you are complaining about: Sydney Olympic Park Authority
	Your full name:
	Your postal address:
	If you are complaining on behalf of someone else, write their full name here: What is your relationship to this other person? (e.g. parent or lawyer) Is the other person capable of making the complaint him or herself? Yes No I'm not sure
	What is the specific conduct you are complaining about? ('Conduct' can include an action, a decision, or even inaction. For example the 'conduct' in your case might be a decision to refuse you access to your personal information, or the action of disclosing your personal information to a third party, or the inaction of a failure to protect your personal information from being inappropriately accessed by someone else.)

	<p>Please tick which of the following describes your complaint: <i>(You can tick more than one)</i></p> <p>collection of my personal/health information</p> <p>security or storage of my personal/health information</p> <p>refusal to let me access or find out about my own personal/health information</p> <p>accuracy of my personal/health information</p> <p>use of my personal/health information</p> <p>disclosure of my personal/health information</p> <p>other</p> <p>I'm not sure</p>
	<p>When did the conduct occur? (Please be as specific as you can)</p>
	<p>When did you first become aware of this conduct?</p>
	<p>You need to lodge this application within 6 months of the date you have written at Q.8. If more than 6 months has passed, you need to ask SOPA's GIPA and Privacy Unit for special permission to lodge a late application. If you need to, write here to explain why you have taken more than 6 months to make your complaint:</p>
	<p>What effect did the conduct have on you?</p>

	What effect might the conduct have on you in the future?
	What would you like to see SOPA do about the conduct? (For example: an apology, a change in policies or practices, your expenses paid, damages paid to you, training for staff, etc.)
	<p>I understand that this form will be used by SOPA to process my request for an Internal Review.</p> <p>I understand that details of my application will be referred to the NSW Privacy Commissioner as required by law, and that the Privacy Commissioner will be kept advised of the progress of the review.</p> <p>I would prefer the Privacy Commissioner to have:</p> <p>a copy of this application form, or</p> <p>just the information provided at Q's 5 - 12.</p>

Your signature:

Dated: ____ / ____ / ____

Now send this form to:

The Privacy Officer
Sydney Olympic Park Authority
Locked Bag 3
Sydney Olympic Park NSW 2127

Email: gipa.privacy@sopa.nsw.gov.au

Keep a copy for your own records.