

Privacy and Confidentiality Policy

Purpose

This Policy outlines AFL SportsReady's approach to managing personal information, data and confidential information. It establishes the standards and responsibilities for using, storing, accessing, sharing and protecting information in accordance with legislative requirements whilst maintaining the trust of employees, apprentices, trainees, students, host employers, donors, stakeholders and the broader community.

Scope

This policy applies to all AFL SportsReady workers, including Board members, employees, trainees, apprentices, consultants, contractors, labour hire workers, volunteers, service providers, and work experience students across all locations.

This Policy also applies to any person who accesses AFL SportsReady systems, records or information in connection with AFL SportsReady operations.

Workers undertaking duties at host employer sites are also required to comply with any applicable privacy and confidentiality requirements of the host employer.

Background

As a national employment, education and training organisation, AFL SportsReady and its related entities *The Ready Foundation* and *SportsReady Education* collects data and manages personal and business information relating to employees, prospective employees, apprentices, trainees, students, host employers, donors and supporters, stakeholders and service providers.

AFL SportsReady recognises that privacy and confidentiality are essential to maintaining trust, delivering services effectively and meeting legal obligations.

AFL SportsReady is committed to complying with the [Privacy Act 1988 \(Cth\)](#), the Australian Privacy Principles and any other applicable privacy, record keeping and information security legislation.

Given AFL SportsReady's role in supporting young people, particular care is taken when managing personal information relating to children, students, trainees and apprentices.

The Ready Foundation which is the charitable arm of the AFL SportsReady Group provides a Data Collection Statement which outlines how data is collected, stored and used, specifically for processing, reporting and managing donations and financial gifts.

Definitions

Term	Definition
AFL SportsReady	Includes AFL SportsReady Ltd, SportsReady Education Ltd and The Ready Foundation Ltd.
Automated Decision Making (ADM)	Automated decision-making involves using data, machines, and algorithms to make decisions on behalf of a business or person. ADM systems can range from decision-support systems that assist human decision-makers to fully automated processes that operate without human intervention.
Confidential Information	Information that is not publicly available and relates to AFL SportsReady's operations, employees, apprentices, trainees, students, host employers, stakeholders, systems or business activities.
Data	Units of information (e.g., name, age, gender, program grades) statistics, facts or observations about a person, group or program
Data Breach	Unauthorised access to, disclosure of, loss of, or misuse of data, personal and/or confidential information.
Health Information	Information or an opinion about an individual's physical, mental or psychological health, disability, injury, medical history, treatment, healthcare services received, or other health-related information that identifies, or reasonably identifies, an individual.
Host Employer	An organisation that hosts an AFL SportsReady employee, trainee or apprentice.
Privacy Breach	An act or omission that results in the unauthorised collection, use, disclosure, loss or access of personal information.
Sensitive Information	Includes health information, disability information, Working with Children Check information, criminal history information, biometric information (where collected), racial or ethnic origin and other information afforded additional protection under privacy legislation.

Principles

AFL SportsReady will:

- Collect, use, and retain only the personal information reasonably necessary to support AFL SportsReady's legitimate operational, contractual, child safety and legislative and fundraising obligations.
- Manage information responsibly, securely and ethically.
- Support the rights of individuals to access, correct and understand how their personal information is collected, used, stored and disclosed.
- Manage personal information in a transparent manner that enables individuals to make informed decisions about their information.
- Protect confidential and commercially sensitive information.
- Ensure information is accessed only by authorised persons or third-party vendors with appropriate privacy and data security controls against Australian Standards.
- Maintain appropriate safeguards to prevent unauthorised access, disclosure, loss or misuse of information.
- Promote a culture where privacy and confidentiality are understood as shared responsibilities.
- Respond promptly to privacy risks, data breaches and information security incidents.
- Ensure child safety considerations are incorporated when handling information relating to children and young people.
- Implement governance, training and monitoring and review processes designed to support compliance with privacy and confidentiality obligations.
- Use technology responsibly and seek consent before any personal or confidential information is applied to Artificial Intelligence applications including Automated Decision-Making tools.

Roles and Responsibilities

Board

- Oversees organisational compliance with privacy, confidentiality and information governance obligations.
- Establish a data ethics, sovereignty and governance policy and framework practices and monitor compliance against the agreed standards and safeguards.
- Monitors significant privacy, data breach and information security risks where appropriate.

Chief Executive Officer and Executive Leadership Team

- Promote a culture of privacy, confidentiality and information security.
- Ensure adequate resources, systems and controls are in place to support compliance with this Policy.

- Implement the data ethics, sovereignty and governance policy and framework, ensuring workers receive adequate training of processes and reporting expectations.
- Provide timely and adequate reporting to the Board on matters impacting privacy, cyber security and data ethics, sovereignty and governance.

Privacy Officer

- Staying abreast of changes to the Privacy Act and associated regulations. Provide guidance on privacy and confidentiality obligations and best-practice. Manage privacy enquiries, access requests and complaints.
- Coordinate responses to privacy and data breaches.
- Monitor legislative changes and support policy review activities.

Head of Information, Technology and Communications

- Ensure appointment of third-party vendors and technology procurement decisions consider vendor privacy policies, data collection storage and data security controls and compliance accreditations against Australian standards.
- Ensure technology solutions are fit-for-purpose and provide privacy and data protection in line with Australian standards
- Monitor and respond to cyber threats and breaches.
- Report cyber and system incidents to the Chief Executive Officer in line with the Cyber Incident Response Procedure.

Managers

- Ensure workers understand and comply with privacy and confidentiality requirements.
- Promptly escalate actual or suspected privacy breaches.

Workers

- Protect personal and confidential information.
- Access information only when required for authorised duties.
- Comply with organisational policies, procedures and security requirements
- Immediately report actual or suspected privacy breaches, data breaches and information security incidents.

Host Contractors and Service Providers

- Handle personal and confidential information only for authorised purposes.
- Comply with applicable privacy, confidentiality and information security obligations.
- Promptly report actual or suspected privacy or security incidents.

Policy Details

1. Collection of Personal Information

AFL SportsReady may collect personal information in connection with:

- Recruitment and employment
- Training and education programs
- Apprenticeship and traineeship arrangements
- Host employer relationships
- Workplace health and safety obligations
- Payroll and employment administration
- Legislative and funding requirements
- Fundraising, philanthropy and management of supporter relationships
- Stakeholder engagement (electronic channels or in-person)

Information will generally be collected directly from the individual concerned unless authorised or required by law.

2. Use and Disclosure of Personal Information

Personal information may be used or disclosed where reasonably necessary for:

- Employment administration
- Payroll and employee benefits
- Performance management
- Workplace investigations
- Education and training services
- Apprenticeship and traineeship support
- Student wellbeing and support
- Workplace health and safety
- Workers' compensation and return to work processes
- Government reporting obligations
- Compliance with legislation
- Service delivery to host employers
- Fundraising and supporter engagement campaigns
- Processing financial donations and managing donor records

AFL SportsReady will obtain consent where required by law before collecting, using or disclosing personal information.

3. Third-Party Service Providers

AFL SportsReady may engage third-party service providers to assist in delivering employment, training, education, technology, payroll, recruitment, fundraising and other operational services.

Where personal information is disclosed to or accessed by third-party service providers, AFL SportsReady will take reasonable steps to ensure appropriate privacy, confidentiality and security protections are in place, including through contractual arrangements where appropriate.

Third-service providers must only use personal information for authorised purposes and in accordance with applicable legal and contractual requirements.

Information on The Ready Foundation's third-party vendor for processing donations is provided on the Data Collection Statement.

4. Cross-Border Disclosure and Data Storage

AFL SportsReady may use technology platforms, cloud-based systems and third-party service providers that store or process information within or outside Australia.

Where personal information is disclosed to, stored in, or accessed from another country, AFL SportsReady will take reasonable steps to ensure the information is handled in a manner consistent with applicable Australian privacy legislation and organisational requirements.

AFL SportsReady will implement appropriate contractual, technical and organisational safeguards to protect personal information and confidential information regardless of where it is stored or processed.

5. Confidential Information

Workers may have access to confidential information during the course of their employment or engagement.

Confidential information includes:

- Financial information
- Business plans and strategies
- Tender documentation
- Commercial arrangements
- Employee records
- Student and trainee records
- Host employer information
- Stakeholder information
- Technical systems and processes
- Contractual information
- Information designated by AFL SportsReady as confidential
- Any information not publicly available relating to AFL SportsReady's operations

Workers must not disclose confidential information to unauthorised persons during their employment or engagement, or after it ends.

6. Access and Security

Workers must:

- Access information only where required for their duties.
- Store information securely.
- Protect passwords and system access credentials.
- Comply with AFL SportsReady cyber security, information management and technology requirements.
- Ensure information is protected when working remotely or at host employer sites.
- Take reasonable steps to protect personal and confidential information when communicating electronically, including checking recipient details before sending emails, limiting information shared to what is necessary, and using approved systems and security controls.
- Immediately report any suspected loss, unauthorised access, disclosure or misused information.

AFL SportsReady will maintain appropriate physical, technical and administrative safeguards to protect personal and confidential information from unauthorised access, disclosure, loss, interference or misuse.

AFL SportsReady may monitor, audit, and review the use of its information systems, devices and networks for lawful business, security, compliance and operational purposes.

7. Employee, Trainee, Apprentice and Student Information

AFL SportsReady recognises that it holds sensitive information relating to employees, apprentices, trainees, students, children and young people. Particular care will be taken when collecting, using, storing and disclosing this information, with regard to privacy obligations, child safety requirements and the best interests of children and young people. AFL SportsReady will only collect, access, use and disclose personal information that is reasonably necessary to support educational, employment, compliance, wellbeing and child safety obligations. Sensitive information may include:

- Health information
- Wellbeing information
- Child safety information
- Educational records
- Working with Children Check information
- Criminal history information
- Personal circumstances

Access to sensitive personal information will be restricted to authorised personnel who require the information to perform their role, and information relating to children and

young people will be handled with additional care and privacy protections in accordance with applicable legal and regulatory requirements.

Where information relates to a child or young person, AFL SportsReady will prioritise the safety, wellbeing and best interests of the child in managing and sharing information, consistent with applicable child safety and mandatory reporting obligations.

7.1 Student Identification and Communication

To minimise privacy risks and protect student information, AFL SportsReady will use student identification numbers rather than student names when communicating student matters wherever reasonably practicable.

Staff must take reasonable steps to ensure that personal information shared in emails, reports, assessment documentation and other communications is limited to the minimum information necessary for the intended purpose.

7.2 Photography and Video Recording for Assessment Purposes

AFL SportsReady recognises the importance of protecting the privacy and safety of children and young people.

For students under the age of 18, photographic, video or other visual recordings are not required for teaching, learning or assessment purposes.

AFL SportsReady will not request or require students under 18 years of age to provide photographic or video evidence as part of the assessment process unless specifically required by a training package, regulatory requirement or legislative obligation and appropriate consent and safeguards are in place.

Any authorised collection of images or videos involving a child or young person must comply with AFL SportsReady's Child Safety Policy, privacy obligations and applicable consent requirements.

8. Host Employer and Stakeholder Information

Workers must manage host employer and stakeholder information responsibly and confidentially.

Information obtained through host employer relationships must only be used for authorised AFL SportsReady purposes and must not be disclosed without appropriate authority.

9. Data Breaches and Information Security Incidents

Workers must report actual or suspected breaches as soon as practicable and no later than the same business day on which any of the following becomes known:

- Privacy breaches
- Cyber security incidents
- Suspected unauthorised access
- Loss of records or devices
- Unauthorised disclosure of information

AFL SportsReady will investigate reported incidents and take appropriate action to minimise risk, meet legal obligations and prevent recurrence.

9.1 Data Breach Response

AFL SportsReady will respond promptly to actual or suspected privacy breaches, data breaches and information security incidents.

Where a breach is identified or reported, AFL SportsReady may:

- Assess the nature and extent of the breach.
- Take immediate steps to contain and reduce the impact of the breach.
- Investigate the circumstances surrounding the incident.
- Determine whether affected individuals, regulators, government agencies, host employers or other stakeholders should be notified.
- Meet any applicable legislative, contractual or reporting obligations.
- Implement corrective actions to reduce the risk of recurrence.
- Review systems, practices and controls following significant incidents.

All workers are required to cooperate with investigations relating to suspected or confirmed privacy breaches, data breaches or information security incidents.

10. Automated Decision-Making and Emerging Technology

AFL SportsReady may utilise technology, digital systems, data analytics and automated processes such as Artificial Intelligence to support service delivery, operational activities and decision-making.

Where personal information is used within automated systems, AFL SportsReady will the use of closed-system applications, seek prior consent and take reasonable steps to ensure such use is lawful, transparent, appropriate and consistent with privacy obligations.

AFL SportsReady will provide information about significant automated decision-making practices where required by law and will maintain appropriate oversight of decisions that may affect an individual's rights, interests, employment, education or training.

11. Privacy Impact Assessment Requirement

AFL SportsReady may undertake privacy impact or risk assessments when implementing new systems, technologies, programs or practices that involve the collection, storage, use or disclosure of personal information.

12. Return of Information

Workers must return all AFL SportsReady information and property when requested or upon cessation of employment or engagement.

This includes:

- Documents
- Records
- Electronic files
- Devices
- Access credentials
- Storage media

Workers must not retain, copy or distribute AFL SportsReady information following the conclusion of their engagement.

13. Retention and Disposal of Information

AFL SportsReady will maintain records in accordance with applicable legislative, funding, contractual and organisational management requirements.

When information is no longer required, AFL SportsReady will take reasonable steps to securely destroy, delete, de-identify or archive information in accordance with applicable legislation and organisational requirements.

Workers must not dispose of records unless authorised to do so and must comply with AFL SportsReady record management requirements.

14. Access and Correction of Personal Information

Individuals may request access to, or correction of, their personal information held by AFL SportsReady, subject to any limitation or exceptions permitted under applicable legislation.

AFL SportsReady will take reasonable steps to ensure personal information is accurate, up to date and complete. The Privacy Officer is responsible for oversight of this Policy and privacy-related enquiries and complaints.

15. Exceptions

This Policy does not apply to information that:

- Is publicly available;
- Was lawfully known by the recipient prior to disclosure;
- Must be disclosed by law;
- Is disclosed as part of a protected workplace right; or

- Is otherwise permitted to be disclosed under applicable legislation; or
- Is disclosed where reasonably necessary to protect the health, safety or wellbeing of an individual, including to meet child safety, safeguarding or mandatory reporting obligations.

16. Privacy Enquiries and Complaints

Questions, requests for access or correction of personal information, privacy concerns and privacy complaints should be directed to the Privacy Officer at privacy@aflsportsready.com.au

AFL SportsReady will manage privacy complaints in a timely, fair and confidential manner and in accordance with applicable legislation and organisational procedures.

Privacy Governance and Review

AFL SportsReady will periodically review its privacy practices, systems and procedures to ensure ongoing compliance with applicable privacy legislation, emerging technologies, regulatory guidance and community expectations regarding the handling of personal information.

Breaches of Policy

Failure to comply with this policy may result in corrective or disciplinary action, including:

- Informal counselling.
- Formal warnings.
- Removal from duties involving children.
- Termination of employment or engagement.
- Referral to external authorities.

Failure to comply with mandatory reporting obligations may also result in criminal penalties under relevant legislation.

AFL SportsReady will assess all suspected privacy breaches and data breaches promptly and will meet any applicable notification requirements under privacy legislation.

Related Policies and Documents

- Employee Code of Conduct
- Child Safety Policy
- Child Safety Code of Conduct
- Child Safety Reporting Guide
- Work Health, Safety and Wellbeing Policy
- Injury Management and Return to Work Policy

- The Ready Foundation Data Collection Statement
- Workers' Compensation and Claims Procedure
- Respectful Workplace - Discrimination, Harassment and Bullying Policy
- Privacy Act 1988 (Cth.)

Policy Review Details

This Policy will be reviewed every two (2) years, or earlier where legislative or organisational changes require.

Version	Effective	Review Approved By	Next Review
1.0	October 2026	AFL SportsReady Chief Executive Officer	October 2028