



REDLANDS CRICKET INC

Privacy Management Policy

Community sporting club privacy framework

Policy owner	Management Committee
Approval date	15/09/2026
Review cycle	At least every two years, or earlier following material legal, system or operational change
Version	2.0 - September 2026 draft
Contact	admin@redlandscricket.com.au

Important: This policy adopts the Australian Privacy Principles as RCI's minimum privacy standard, whether or not every provision of the Privacy Act 1988 (Cth) legally applies to RCI at a particular time.

1. Purpose

Redlands Cricket Inc (RCI) respects the privacy of players, parents and guardians, members, volunteers, coaches, officials, employees, contractors, sponsors, visitors and other stakeholders. This policy explains how RCI collects, holds, uses, discloses, secures, accesses, corrects and disposes of personal information in connection with its community cricket activities.

The policy is intended to support transparent and responsible information handling, safeguard children and other participants, and provide a practical framework for staff and volunteers.

2. Legal and governance framework

This policy is informed by the *Privacy Act 1988* (Cth), including the Australian Privacy Principles (APPs), and the Notifiable Data Breaches (NDB) scheme where those laws apply to RCI. RCI will also comply with other applicable laws, contractual requirements and cricket governing-body rules concerning information handling.

Many small businesses and not-for-profit organisations with annual turnover of \$3 million or less are not covered by the Privacy Act, although exceptions can apply. Coverage may arise, for example, because of turnover, particular activities, a Commonwealth contract, trading in personal information, provision of a health service while holding health information, handling tax file number information, a related body, or a voluntary opt-in. RCI will periodically review its legal status and will apply the APP-aligned standards in this policy as good practice regardless.

This document is a governance policy, not legal advice. RCI should obtain legal advice if its Privacy Act coverage or obligations are uncertain.

3. Scope

This policy applies to all personal information handled by or on behalf of RCI, in paper or digital form, and to all committee members, employees, volunteers, coaches, team managers, contractors and service providers who handle that information.

It covers club administration, registrations, competitions, training, events, facility access, websites, social media, photography and video, CCTV, incident management, child safety, employment and volunteering, fundraising, sponsorship, marketing and communications.

4. Definitions

Personal information

Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not.

Sensitive information

A category of personal information that includes health information, racial or ethnic origin, religious beliefs, sexual orientation, criminal record and membership of professional or trade associations. RCI will only collect sensitive information where it is reasonably necessary and with consent, unless an exception permitted by law applies.

Health information

Information or an opinion about an individual's health, disability, injury, health services or wishes concerning future health services.

Data breach

Unauthorised access to, unauthorised disclosure of, or loss of personal information held by RCI.

Child or young person

For this policy, a participant under 18 years of age. RCI will use clear, age-appropriate privacy explanations and involve a parent or guardian where appropriate, while considering the young person's capacity and circumstances.

5. Privacy responsibilities

- **Management Committee:** approves this policy, provides oversight and receives material privacy or data-breach reports.
- **Privacy Officer:** coordinates privacy requests, complaints, training, risk reviews and breach response. Unless another person is formally appointed, the RCI Secretary will perform this role.
- **System and information owners:** ensure access is limited, records are accurate, retention is justified and service providers are appropriately managed.
- **All authorised users:** follow this policy, use information only for approved club purposes, protect accounts and devices, and promptly report privacy incidents.

6. Information RCI may collect

- identity and contact details, including name, address, email address, telephone number, date of birth and emergency contacts;
- membership, registration, team, participation, eligibility, accreditation, disciplinary and cricket history;
- parent or guardian information for junior participants;
- health, injury, allergy, disability, medication or accessibility information needed to support safe participation;
- Working with Children Check, Blue Card, police-check, qualification, employment and volunteer information, where relevant;
- payment and transaction details, excluding full payment-card data where processed by a payment provider;
- photographs, audio, video, livestream footage, match reports, statistics and awards;
- CCTV and access-control records at RCI facilities;
- website, device and online-service information such as IP address, browser type, cookies and usage logs;
- communications, surveys, feedback, complaints, incident reports and insurance information; and
- other information provided voluntarily or required for the club's lawful activities.

RCI will not collect personal information merely because it may be useful later. Collection must be reasonably necessary for an identified club function or activity.

7. How RCI collects information

RCI will generally collect personal information directly from the individual, or from a parent or guardian where appropriate, through registration forms, PlayHQ or other approved platforms, email, telephone, websites, surveys, event forms, incident reports and face-to-face interactions.

RCI may also collect information from Queensland Cricket, Cricket Australia, affiliated clubs, competition administrators, referees, insurers, service providers, publicly available sources or other third parties where authorised, expected or reasonably necessary. If information is collected from someone else, RCI will take reasonable steps to ensure the individual is aware of the collection where required and practicable.

8. Collection notices and consent

At or before collection, or as soon as practicable afterwards, RCI will provide an appropriate privacy notice describing who is collecting the information, the purpose, usual disclosures, any legal or practical consequences of not providing it, how to access or correct it, how to complain, and any likely overseas disclosures where relevant.

Consent requests must be voluntary, informed, current and specific to the purpose. Consent may be withdrawn, subject to legal, safety, competition or recordkeeping requirements. Separate consent should be sought where appropriate for sensitive information, optional marketing, photography or uses that a person would not reasonably expect.

9. Use and disclosure

RCI will use or disclose personal information for the primary purpose for which it was collected, for a related purpose that the individual would reasonably expect, with consent, or where otherwise authorised or required by law. Purposes may include:

- administering membership, registrations, teams, fixtures, competitions, programs, coaching and club events;
- verifying identity, age, eligibility, accreditation, qualifications and volunteer suitability;
- supporting participant health, safety, wellbeing, accessibility, insurance and emergency response;
- communicating club news, operational information, changes, opportunities and member services;
- managing facilities, security, misconduct, complaints, child safety, integrity and disciplinary matters;
- processing payments, refunds, sponsorship matters and financial administration;
- maintaining historical, statistical and honour-board records where appropriate; and
- meeting legal, insurance, affiliation, grant, audit and governing-body requirements.

RCI may disclose information to Cricket Australia, Queensland Cricket, PlayHQ or other approved registration and competition providers, affiliated cricket organisations, insurers, professional advisers, payment providers, IT and communications providers, venue or security providers, government bodies, emergency services or law-enforcement agencies where appropriate. RCI will limit disclosure to what is reasonably necessary and use contractual or other safeguards where practicable.

10. Direct marketing, sponsors and fundraising

RCI may send club news, membership, event, fundraising, merchandise or sponsor-related communications where permitted. Each electronic direct-marketing communication will provide a simple way to opt out, and RCI will action opt-out requests within a reasonable period. RCI will not sell its membership list. Personal information will not be given to a sponsor for the sponsor's independent marketing without consent or another lawful basis.

RCI will take particular care not to direct-market to children using sensitive or exploitative profiling.

Communications intended for junior participants should ordinarily be sent to, or copied to, a parent or guardian in accordance with RCI communication and child-safety practices.

11. Children and junior participants

RCI recognises that junior cricket involves heightened privacy expectations. It will minimise collection, explain handling in plain language, restrict access to those who need it, and avoid publishing unnecessary identifiers, contact details, medical information or location information.

Team lists, photographs, livestreams, statistics and results may be published for legitimate cricket and community purposes. RCI will use appropriate notices and permissions, consider safety objections, and provide a clear contact pathway for concerns or removal requests where practicable. Images must not be accompanied by sensitive personal details or used in an inappropriate or demeaning context.

12. Health and other sensitive information

RCI may collect health or other sensitive information where reasonably necessary for safe participation, injury management, insurance, accessibility, child safety, integrity, employment or volunteering. Access will be restricted to authorised people with a need to know. Coaches and team officials should receive only the minimum information required to safely perform their role.

Health information must not be included in general team lists, unprotected shared drives or broad email distributions. In an emergency, RCI may disclose relevant information to medical personnel, emergency services or others where reasonably necessary to reduce a serious threat to health or safety, consistent with applicable law.

13. Photography, video, livestreaming and social media

RCI may capture or publish images and footage of cricket activities for participation, coaching, promotion, reporting, historical and community-engagement purposes. RCI will provide reasonable notice, respect documented restrictions, avoid intrusive capture in private areas, and apply additional care to children and vulnerable participants.

Members and visitors should not post another person's contact, medical, disciplinary or other private information on social media. Requests about RCI-controlled content should be directed to the Privacy Officer. Removal may not always be possible where content has been lawfully republished by third parties or must be retained for legal reasons.

14. CCTV and facility security

RCI may use CCTV or related security systems for safety, asset protection, incident investigation and access management. Signage should identify monitored areas. Cameras must not be installed in toilets, change rooms or other locations where a person reasonably expects privacy. Footage access is restricted and disclosure will occur only for an authorised purpose, including to police, insurers or legal advisers where appropriate.

15. Data quality, access and correction

RCI will take reasonable steps to ensure personal information is accurate, up to date, complete and relevant. Individuals may request access to, or correction of, personal information held about them by writing to admin@redlandscricket.com.au. RCI may verify identity before processing a request.

RCI will respond within a reasonable period. Access may be refused or limited where permitted by law, including where it would unreasonably affect another person's privacy or prejudice an investigation. If access or correction is refused, RCI will provide written reasons and available complaint options where required.

16. Security and access control

RCI will take reasonable steps to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure. Controls should be proportionate to sensitivity and risk and include:

- role-based access and prompt removal of access when a role ends;
- multi-factor authentication where available, strong passwords and no account sharing;
- approved systems, secure configuration, patching, backups and endpoint protection;
- encryption or secure transfer for sensitive information;
- locked storage and secure disposal of paper records;
- privacy and cyber-security induction for relevant staff and volunteers;
- careful email addressing, use of blind copy where appropriate, and avoidance of unnecessary attachments;
- supplier due diligence, confidentiality obligations and access limitations; and

- regular review of permissions, shared folders, forms and data exports.

Personal information must not be stored in personal email accounts, unapproved cloud services, personal messaging apps or unmanaged devices unless expressly authorised and appropriately protected.

17. Retention and disposal

RCI will retain personal information only for as long as reasonably necessary for the purpose collected, or as required by law, insurance, taxation, employment, child safety, integrity, dispute, grant or governing-body requirements. Information that is no longer required will be securely destroyed or de-identified.

RCI will maintain a records-retention schedule defining record categories, accountable owners, minimum retention needs and secure disposal methods. Litigation holds, investigations or anticipated claims suspend normal disposal.

18. Overseas disclosure and cloud services

Some approved technology providers or governing-body systems may store or process information outside Australia. Before using a service involving likely overseas disclosure, RCI will assess privacy and security risks, review contractual protections and provide notice of likely countries where required and reasonably practicable. RCI will not assume that cloud storage is Australian merely because the provider operates in Australia.

19. Website, cookies and online services

RCI websites and online services may collect IP addresses, device and browser information, time and date of access, pages viewed, cookies and similar technical data. RCI uses this information for security, functionality, analytics and service improvement. Cookie settings may be controlled through a user's browser, although disabling cookies may affect functionality.

Links to third-party websites are governed by those parties' privacy practices. RCI should configure analytics, forms and website plug-ins to minimise collection and must publish an appropriate collection notice where personal information is requested.

20. Data breaches and incident response

Any suspected loss, unauthorised access, mistaken disclosure, compromised account or other privacy incident must be reported immediately to the Privacy Officer. The response will:

- **Contain:** stop or limit further access, disclosure or loss;
- **Assess:** establish what happened, what information and people are affected, and the likelihood of harm;
- **Notify:** notify affected individuals, the Office of the Australian Information Commissioner (OAIC), governing bodies, insurers, police or other authorities where legally required or otherwise appropriate; and
- **Review:** document the incident, remediate causes and improve controls.

If RCI is covered by the Privacy Act and there are reasonable grounds to believe an eligible data breach is likely to result in serious harm, RCI will comply with the NDB scheme. Suspected eligible breaches will be assessed expeditiously in accordance with the Act. No committee member, worker or volunteer may make an external breach notification on RCI's behalf unless authorised.

21. Complaints

A person may make a privacy complaint in writing to the Privacy Officer at admin@redlandscricket.com.au. The complaint should describe the concern, relevant dates, information involved and preferred outcome. RCI will acknowledge, investigate confidentially, provide a response within a reasonable period and keep appropriate records.

If the person is dissatisfied and the Privacy Act applies, they may be able to complain to the OAIC. RCI will not victimise a person for making a privacy complaint in good faith.

22. Third parties and service providers

Before giving a supplier access to personal information, RCI will consider necessity, data location, security, breach notification, subcontracting, deletion or return of data, audit rights and confidentiality. Access must end when no longer required. Where RCI and another cricket body both handle the same information, responsibilities should be documented where practicable.

23. Training, monitoring and review

People with access to personal or sensitive information will receive privacy guidance appropriate to their role. RCI will periodically review access, systems, data collections, consent wording, collection notices, suppliers, complaints and incidents. Material privacy risks and breaches will be reported to the Management Committee.

This policy will be reviewed at least every two years and earlier if there is a material change to law, technology, governing-body requirements or RCI operations.

24. Contact details

Privacy Officer

Redlands Cricket Inc

Email: admin@redlandscricket.com.au

Website privacy notices, registration notices and consent forms should be read together with this policy. Where there is an inconsistency, applicable law prevails.

Appendix A - Practical privacy checklist for RCI officials

- Collect only what your role genuinely requires and explain why it is needed.
- Use approved club systems and do not export member data without a clear purpose.
- Check recipients and attachments before sending email; use blind copy for large external groups.
- Do not place medical, child-safety or complaint details in general team chats.
- Limit team sheets and contact lists to authorised recipients and delete local copies when finished.
- Lock devices, use multi-factor authentication where available and never share passwords.
- Obtain appropriate permission before using images outside expected cricket reporting and promotion.
- Report a lost device, wrong-recipient email or suspicious account activity immediately.
- Return or securely delete RCI records when leaving a role.
- Refer access, correction and complaint requests to the Privacy Officer.

Appendix B - Policy implementation actions

Action	Owner	Status / review
Formally appoint the Privacy Officer	Management Committee	On approval
Confirm whether RCI is legally covered by the Privacy Act and document the basis	Management Committee / legal adviser	Annual review
Publish this policy and aligned collection notices	Privacy Officer	On approval
Create a records-retention schedule and secure disposal process	Secretary / Treasurer	Within governance work plan
Review PlayHQ, website, email, cloud storage, CCTV and other supplier arrangements	Privacy Officer / IT	Annual review
Create and test a data-breach response plan and contact list	Privacy Officer / IT	Annual exercise
Review access after committee, staff and volunteer role changes	System owners	At each change
Provide privacy induction to officials handling member information	Privacy Officer	Each season

Document control

Version	Date	Summary	Approved by
1.0	1 December 2021	Previous policy	RCI
2.0	September 2026 draft	Comprehensive rewrite aligned to the Privacy Act 1988, APP framework and community sporting-club operations	Pending