COMMUNICATIONS STRATEGY

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SECTION 1: COMMUNICATIONS POLICY FRAMEWORK

1.1 Policy statement

Southern Peninsula Basketball Association (SPBA) is committed to effective, accessible, transparent and equitable dissemination and receipt of information and communications within the organisation and with members, stakeholders, and the media.

1.2 Purpose and scope

The purpose of this policy is to provide guidance to SPBA in developing and implementing communication strategies.

This policy applies to all staff, Board members, volunteers and members:
» The purpose of the organisation's communications
» Communication tools and mechanisms
» Feedback and complaints from members and stakeholders
» Privacy and confidentiality
» Social media
» Marketing and promotion
» Liaison with the media.

This policy does not provide detailed guidance on:
» Partnerships and external relationships
» Management of information
» Website content and review

1.3 Principles

» Communication with members, staff, stakeholders, media and the broader community is a key activity of the organisation.
» Clear, consistent and equitable communication within the organisation is essential for effective organisational strategies and operations.
» External communication is broadly representative of the members and community needs.
» Communication strategies ensure access, equity, timeliness, accountability and integration.
» The organisation understands that some information may be sensitive in nature and holds information in accordance with the <u>Privacy Act 1988</u> and the <u>Victorian Privacy and Data Protection Act 2014</u>.

1.4 Outcomes

» SPBA staff, Board members and members are consulted and engaged through the provision of information of the organisation's activities and operations.
» Organisational communication practices increase awareness of SPBA and enhance the organisation's position in the community.
» Internal communication practices supports sharing of knowledge, good management and operations within the organisation.

» External communication strategies are considered in organisational planning as part of its formal quality improvement program.

1.5 Delegations

Board of Management	» Endorse and ensure compliance with this Communications Policy. » Respond to complaints relating to the General Manager or President as required.
Employees	» Comply with this Communications Policy. » Contribute to internal and external communication strategies and activities. » Actively contribute/write articles and collate items of interest for the organisation's communications. » Receive feedback and complaints and direct these to the General Manager for handling when required. » Maintain, develop and disseminate program and service materials, including client and promotional materials. **General Manager** » Act as the primary contact to communicate between the employees and the Board. » All primary liaison with media is responsibility of the General Manager, **i**ncluding developing and responding to media releases. » Endorse draft media releases prepared by other staff. » Oversee production of external communications. » Manage feedback and complaints processes, including the identification of appropriate staff as complaint handlers. **Internal Employees** » Have a working knowledge of the organisation's legislative requirements regarding: communication, privacy, and the collection, storage and use of personal information. » Ensure systems are in place across the organisation to communicate appropriately and adequately protect the privacy of personal information of members, staff members and stakeholders. » Promote program and services in external meetings. » Manage complaints as determined by the General Manager or direct supervisor. » Record feedback when relevant and notify relevant staff of feedback.
Media Co-ordinator	**Media Co-ordinator** » Update content of the communications database. » Production of the organisation's newsletter. » Website and social media platform review and maintenance.

1.6   Policy implementation

This policy is developed in consultation with all staff and is approved by the Board of Management.

This policy is part of all orientation processes and all Board members, staff and volunteers are responsible for understanding and adhering to this Communications Policy.

This policy is referenced in relevant policies, procedures and other supporting documents to ensure that it is familiar to all staff and is actively used. This policy is reviewed in line with the organisation's quality improvement program.

This policy must be read in conjunction with the following policies:
»   Employee Handbook

1.7   Risk management

SPBA develops and implements communication(s) systems and actions relating to privacy and confidentiality to ensure they are effective and regularly monitored and comply with relevant legislation.

All staff, volunteers and Board Members are made aware of this policy during orientation and are provided with ongoing support to assist them to effectively use internal and external communication systems and to establish and maintain privacy and confidentiality.

SECTION 2:   EFFECTIVE COMMUNICATION

This Section ensures that SPBA implements mechanisms and tools to communicate effectively internally, and externally with its stakeholders and the broader community in order to enhance the organisation's operation and achieve its strategic goals.

2.1   Purpose of communications
SPBA communicates for several purposes, to:
» Increase awareness of the organisation and its goals
» Enhance community understanding of its vision
» Promote the work of the organisation
» Share knowledge and improve understanding of its members, stakeholders, and the broader community
» Share knowledge within the organisation to ensure effective organisational management.

Communication strategies and activities are undertaken to assist and support the achievement of broader organisational strategic goals.

2.2   Types of communication
SPBA communication types include:
» Internal: information and knowledge that is shared within the organisation.
» Incoming: information and knowledge that is sought and/or received from an external source.
» Outgoing: information and knowledge that is initiated, developed and distributed by the organisation for an external audience.

2.2.1   Internal communication
Internal communication is information and knowledge that is shared within the organisation. Effective internal communication is essential for good organisational management. All Board members, staff, and volunteers are responsible for contributing to the organisation's communication strategies and activities.

A range of mechanisms and tools are used for internal communication. These include:

» **Staff, team and specific project meetings**
Staff, team and project meetings provide opportunity for information-sharing and decision-making on a range of project and operational issues. All staff are required to attend staff meetings, and relevant staff are required to attend both their team and project meetings.

» **Board and sub-committee meetings**
Board and sub-committee meetings support effective governance for the organisation. Board meetings may also include time for staff to communicate with the Board on a range of project, operational or general issues for the organisation.

» **Supervision and workplan review meetings**
Supervision and workplan review meetings are convened between staff, volunteers and their corresponding supervisors. These meetings provide an opportunity to discuss challenges and achievements within the individual's work role and provide an opportunity for feedback on how to address situations in the future. Depending upon the nature of the worker's role, these meetings may also be held in one-on-one or group settings and may also include work planning around specific projects or activities.

» **Email and electronic calendars**
The use of email and electronic calendars is essential for effective communication amongst staff and volunteers. These tools are a simple and effective way to share information. These tools also provide a record and may be considered as a means of formal documentation.

All staff are expected to use email and share electronic calendars. Information is also shared internally through other communication mechanisms, such as:
» Monday.com
» Slack/Microsoft Teams
» Fellow Meetings
» Zoom Meetings

2.2.3   Incoming communication
Incoming communication is information and knowledge that is sought and/or received from a source that is external to the organisation. Incoming communication supports the organisation to work towards its goal/s, strategic plan and service delivery.

SPBA receives incoming communication from the following sources:
» Current and potential members
» Governing bodies
» Community organisations
» Media
» Sponsors & partners.

A range of mechanisms and tools are used to receive incoming communication, including those described in outgoing communication below.

2.2.4   Outgoing communication
Outgoing communication is information and knowledge that is initiated, developed and distributed by the organisation for an external audience.

Refer to the Corporate Image Section of this policy for information on corporate image, branding and copyright which is relevant to all organisational communication(s).

SPBA provides outgoing communications to the following audiences:
» Members and potential members
» Media
» Community organisations
» Governing bodies

» Sponsors & partners.

To develop outgoing communication, SPBA conceptualises and develops effective communications structured around the following:

Component		Example
Element	Details	
What	Identify broadly what it is that is to be communicated	Basketball Victoria Country Skills Day is a training camp and an entry point for selection into the BVC High Performance Program.
Message	Use a message(s) to communicate	Details of the day, structure, its position in the pathway of athletes, how we can support athletes, examples of athletes through program.
Audience	Identify who the audience is, adapt the message accordingly	Existing representative members – cater to the current understanding of the audience. For example, U12/14 families will typically have little knowledge of pathways.
Messenger	Identify who will do the communicating and why	Communication to be distributed by Director of Coaching as it is an on court pathway program.
Mechanism	How will the message be communicated?	Website, social media, direct emails, verbal communication by coaches, pre-season club day, identifying LTAD athletes, VJBL information pack.
Review	Was the message received, understood? Did it create interest? Was there any feedback?	Assess the number of Southern Peninsula players attended and selected. Were families prepared and understood the purpose of the day? Seek feedback on the day, the way it was communicated and what improvements can be made.

A range of mechanisms and tools are used to distribute outgoing communication. These include:

» **Organisation website**
  The website is a primary tool for distributing outgoing information to a broad audience. Information about the organisation's goal, services, programs, eligibility and access information, governance, activities, current projects and news items is maintained by the Media Co-ordinator. Web content should be clear, concise, engaging and written in plain English.

» **Organisation newsletter**
  The SharkAttack newsletter is produced monthly with a primary target audience of Association Members. All staff contribute and write articles for the newsletter and staff will work with members and stakeholders when relevant to develop content for the newsletter.

- » **Email updates and project-specific email updates**
  Email updates produced by the organisation include:
  - o **Department Updates:** prepared by the head of each department which will be distributed on a quarterly basis with a primary audience of the department participants (where applicable) and secondary audience potential participants and the general community.

- » **Organisational documents**
  SPBA produces a number of organisation and project-specific documents that provide information about its plans, achievements, and activities.
  Organisational documents for outgoing communication will also to be distributed internally, to all staff and Board members when relevant.

- » **Conference, forum and meeting representation**
  Board and staff members participate in relevant conferences, forums, and advisory groups representing the organisation.

- » **Media communication**
  SPBA may produce or respond to media releases on behalf of the organisation. Media releases may be developed to promote an event or project achievement, advocacy on behalf of members, and/or the organisation.

  The organisation may partner with other organisations in producing or responding to a media release. The General Manager and President hold responsibility for liaison with the media.

- » **Stakeholder meetings**
  Staff participate in regular meetings with relevant stakeholders (such as clubs, coaches, members) to provide support, share information about current services, projects and issues, and to gather feedback on services.
  Regular contact with stakeholders is part of the organisation's service delivery and operations.
  All staff are responsible for developing and maintaining effective relationships with stakeholders.

2.3   Record-keeping

All documents bearing the organisation's name and/or logo, including digital and electronic materials, must be saved via the company's OneDrive system.

SECTION 3:   CORPORATE IMAGE

The purpose of this Section is to provide guidance to SPBA in developing and maintaining a clear and consistent language and branding to improve awareness of the organisation and enhance access to information about goals, services and programs.

SPBA's corporate image refers to logos, design elements, typography, templates and any other visual identification that identifies or relates to the organisation.

This Section applies to all staff, volunteers and Board members.

This Section also ensures that the organisation's:
» Language and branding are consistent and clear throughout all activities
» Corporate image supports the access to information and services
» Corporate image enables the general public to identify and recognise the organisation
» Corporate image supports and increases the credibility of the information provided by the organisation.

3.1   Branding

3.1.1   Logo
The SPBA name and logo are protected and must only be used for communications that are directly related to the organisation.

The organisation's logo is to be used on all internal and external documentation. All outgoing communications must carry the organisation name and/or logo; these communications include: letters, reports, project materials and emails.

A general guide for documents is:
» **General documents** (i.e. letters, terms of reference, others): The SPBA Letterhead shall be utilised (this should be the main use of the organisation's logo
» **Cover documents** (i.e. proposals, project submissions, reports): 5cm x 9.36cm, aligned to the be centred.

There will be plenty of 'white space' or clear space around the logo so it doesn't appear too crowded and will stand out. A general guide for clear space around the logo is:
» 2cm x 8cm

The colour for the organisation logo is as per the SPBA Style Guide. The logo colours are not to be reversed without prior permission of the General Manager.

There are multiple file formats and sizes of the SPBA logo. The preferred file format to use on publications is the With border – Main Logo.png or Secondary Icon.png. For high resolution uses the appropriate files end in eps or ai. Smaller file sizes may be used for website content.

The logo files are located at OneDrive/OfficeStaff/SPBA Communications.

3.1.2   Typography
The preferred font and formatting details for published documents and letters at SPBA are:
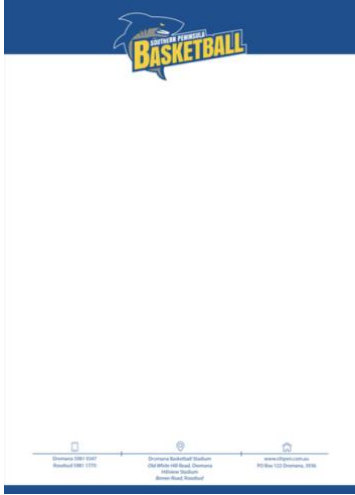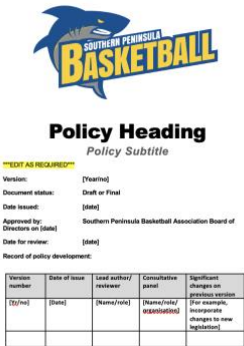
SPBA formatting
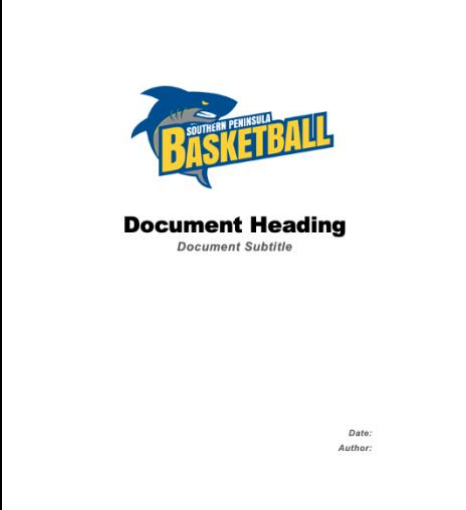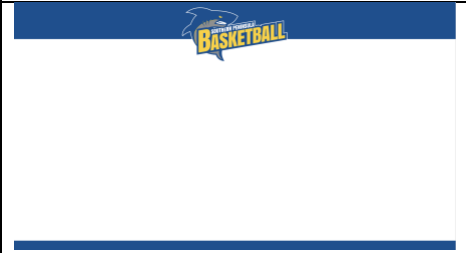
Item	Format
Font	Arial
Font colour	Black
Text size	11
Preferred spacing	1.15
Text alignment	Align Left

3.1.3   Design templates

In order to provide clear information and a consistent style for organisational documents, SPBA has developed a range of templates with the organisation branding and style for both internal and external documents.

SPBA design templates include:

Template name	Description	Template image
MS Word Letter Head	For use with letters, terms of reference and short documents.	
MS Word Policy Template	For use of organisation policy documents that go though an approval and review process.	

MS Word Information Document	For use with organisation information documents.	
MS PowerPoint presentations	For use with internal or external meeting communications.	

Electronic copies of the organisation's templates are located at OneDrive/OfficeStaff/SPBA Communications

3.1.4 Document templates

Document templates are consistent with SPBA branding and style for both internal and external documents. These templates are used when developing the following:

» Letters
» Information Packs
» Media Releases
» Meeting Notes

3.1.5 Corporate stationery

All stationery, such as letterhead paper, envelopes, business cards and invoices must display the organisation's logo.

Corporate stationery files are located at OneDrive/OfficeStaff/SPBA Communications/OfficeStationary

Standard corporate stationery includes:

Stationery document	Stationery document image

Standard A4 paper	
Business cards	

3.1.6 Organisation description

A consistent organisation message demonstrates a cohesive, focused and professional organisation for members, stakeholders and the broader community. The following summary is to be used in the development of service, project and program reports, proposals, grant submissions, agreements and media communications.

The organisation's long description is:

About SPBA

The SPBA is a not-for-profit sporting organisation which is the largest on the Mornington Peninsula. Our objective is to administer the sport of basketball from Mornington to Sorrento. Providing an avenue for it's players, coaches, officials and administrators to participate and develop through organised competitions and development programs.

SPBA represents our members of all skill levels, abilities and ages. We provide a range of services, including competitions, development programs, high performance programs and further development opportunities for our players, coaches, referees, administrators and volunteers. We also pride ourselves on our community involvement in the wider Mornington Peninsula region. These services/programs focus on providing development opportunities in a fun, safe and engaging environment.

The organisation operates across multiple venues, including Dromana, Rosebud & Sorrento.

SPBA is governed by a Board of Management primarily elected by the members and it holds affiliation and accreditation with Basketball Victoria.

Further information about SPBA, its programs and services is available on the SPBA website at www.sthpen.com.au.

The organisation brief presentation is:

About SPBA

The SPBA is a not-for-profit sporting organisation which is the largest on the Mornington Peninsula. Our objective is to administer the sport of basketball from Mornington to Sorrento.

Our goal is to provide increasing avenues for players, coaches, officials and administrators to participate and develop through organised competitions and programs.

3.1.7 Promotional material
Photographs of documents and publications for promotion are located at OneDrive/OfficeStaff/SPBA Communications/Promotional.

3.2 Language and terminology

3.2.1 Australian English vs. American English Spelling
All documents should be written using Australian English.

3.2.3 Correspondence address blocks and signatures

3.2.3.1 Email correspondence
Emails are a main tool for distributing internal and outgoing information to staff, stakeholders and broader networks.

All emails sent from SPBA are the property of the organisation and may be subject to review by Management. All emails sent from SPBA representatives are written in a professional manner, are clear, concise and with privacy and confidentiality in mind. Communication about members internally or externally will only include information relevant to the topic and will be marked as confidential. A consistent format for SPBA emails includes:

Item	Description	Example of item
Salutation	Include a standard salutation line when sending an email to members.	Hi "Name" Dear "Name/s"
Email content	Font for any email is Arial, size 11, colour black.	Today's session is going ahead as planned, but if the weather persists will be catered for an area undercover.
Closing line	Include a standard closing line when sending an email to members.	Kind regards, *Employee Name*

Staff member signature	Use a consistent email signature containing the following details:
	» Name
	» Position
	» Organisation name
	» Contact details
	» Organisation website
	» Organisation logo
	» Flags
	   o Aboriginal Flag
	   o Torres Strait Island Flag
	   o Rainbow Flag	

Acknowledgement of traditional custodians	An acknowledgement to the traditional custodians of the land is to be included underneath the signature block. This text should be in a medium grey colour.	SPBA acknowledges the people of the Kulin Nation and the Bunurong people, the traditional custodians and pay our respects to their culture and their Elders past, present and emerging. We are respectful of the ongoing living cultures of Aboriginal Peoples from all of the Victorian Aboriginal Nations. We welcome all cultures, nationalities and religions. Being inclusive and providing basketball for all is our commitment.

Disclaimer	The disclaimer to the right should be included in all emails. This text should be in a medium grey colour.	*This document and any attachments are intended solely for the named addressee, are confidential, and may be subject to professional privilege. If you are not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this e-mail is strictly prohibited. If you have received this document in error, please notify us immediately by return email and destroy the original message. Any confidentiality or privilege is not waived or lost because this e-mail has been sent to you by mistake.*

3.2.3.2 Letterhead correspondence

Formal correspondence is an essential tool to inform members, stakeholders and broader networks of decisions, invitations, official activities or directions of the organisation. A consistent format for SPBA formal correspondence is as below.
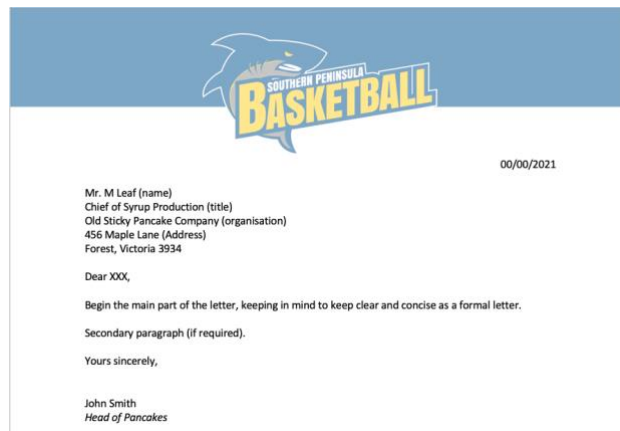
SECTION 4:   MEDIA COMMUNICATIONS

The purpose of this Section is to provide guidance on responding and commenting on organisational operations and strategies through media outlets in order to improve service participation, enhance the transparency and fully realise the organisation's goals and strategic outcomes.

SPBA's media communication strategies and processes ensure that anyone in the organisation who is called upon to communicate with a media outlet on behalf of the organisation responds in a way that is consistent, appropriate, transparent and accountable.

This section applies to all staff, volunteers and Board members.

This Section also ensures that:
» Media outlets are used to share and promote access to information and services
» Opportunities are created to listen to and engage with the public, local communities, and the sector on different levels
» Staff members are aware of the internal protocols for media liaison
» Media communication is developed and delivered consistently and appropriately
» Media strategies and processes align with the organisation's values, legal requirements, related policies, and codes of conduct.

4.1   Purpose of media communication
SPBA liaises with the media in order to:
» Advocate for and represent the community and client group
» Create awareness and understanding of the organisation's role
» Promote the work and outcomes of both the organisation and its members

4.2   Media release
SPBA may produce or respond to media releases on behalf of members and/or the organisation. Drivers for producing or responding to media releases include: the promotion of a major event, a project achievement, advocacy on behalf of members, or to counter any negative media coverage relating to the organisation.

SPBA may collaborate with other organisations in producing or responding to a media release.

Situations where a media release may be appropriate include:
» Responding to a request from a media entity
» Responding to an existing media release or a publication
» Promotion or launch of a major SPBA project, program or event
» Communicating a position on a particular issue relevant to the organisation's operations.

Refer to the organisation's Media Release Templates for further guidance.

4.3 Media liaison

The SPBA Board President and/or General Manager hold full responsibility for liaising with media, including developing and responding to media releases and providing media interviews. Other staff may contribute to the development of media releases with final endorsement and/or presentation by the organisation's President and/or General Manager.

The organisation will nominate a member to perform these duties in the absence of the organisation's President and/or General Manager.

SPBA welcomes the opportunity to liaise with the media to represent and advocate for the organisation, its members and the community it represents.

4.4 Developing and maintaining media relationships

SPBA understands media deadlines and time constraints and tries to respond promptly to any media enquires as a matter of priority, where possible.

All media enquiries are directed to and responded to by the General Manager and/or the President; alternatively to Media Co-ordinator in the absence of the organisation's General Manager and/or President.

Following any type of media communication, including positive or negative, the General Manager will telephone or email the media contact to provide feedback on the media opportunity and to further strengthen the relationship with the organisation.

4.5 Content of media communications

SPBA complies with relevant privacy and defamation obligations, including the Privacy Act 1988 and does not identify individuals, groups or organisations without consent, and does not engage in derogatory, demeaning or personal attacks.

Media communications are broadly representative of the organisation's members, or specifically related to the community it serves, programs, services, projects or events.

SPBA reserves the right to withhold certain sensitive information. Any such information will be clearly labelled and conveyed to staff authorised to engage with the media.

If any unauthorised releases of confidential information do occur, an investigation will take place to establish who was responsible and appropriate action will be taken.

Where opinion is provided from the perspective of a person whose expertise is in the basketball or sporting sector, this is made clear to the media contact and that it may or may not be broadly representative of the organisation or its members.

4.5.1 What to do in the event of a Media Crisis

A media crisis is an event (such as a mistake, problem, error of judgement, political controversy or accident) that has been made public through a range of media modalities and that can have a negative effect on the reputation of a brand, organisation or individual.

As part of SPBA's risk management strategy, a Crisis Communications Plan has been developed to deal with the media in situations where accidents/controversy/muck-up or legal action has happened / taken place.

A Crisis Communications Plan ensures that SPBA has:
» An appointed spokesperson
» A process where everyone in the organisation knows who to call should a major incident or media crisis develop
» An established process where Board members and senior staff can gather as much accurate information as quickly as possible
» A process whereby accurate information can be provided to the media as soon as practicable

The General Manager is the appointed spokesperson for SPBA in crisis situations.

The General Manager is responsible for developing and maintaining the Crisis Management Plan.

Crisis communication management is a 9-step process:
Pre-crisis
   1. Anticipate crises
   2. Identify your crisis communications team
   3. Identify and train spokespersons
   4. Establish notification and monitoring systems
   5. Identify and know your stakeholders
   6. Develop holding statements
Post-crisis
   7. Assess the crisis situation
   8. Finalise and adapt key messages
   9. Post crisis analysis

SPBA follows these basic principles in dealing with media crises:

» Decide that there is a crisis: The successful handling of a crisis can be decided in the first hours or days. The sooner you take action, the better your chances of coming out with your reputation intact.
» Understand who the media represent: Frame your responses with the real audience in mind, e.g. members, government funding bodies
» Release as much as you can as quickly as you can: The sooner you respond and show that you are acting in a sincere, honest and reliable manner, the sooner your voice is listened to and trusted.
» Avoid the Bart Simpson defence: "I didn't do it, nobody saw me do it, you can't prove a thing."

- » <u>Say only what you know to be true:</u> Be honest and stick to only confirmed information you know to be accurate and correct.
- » <u>Remember that first impressions count:</u> Your attitude, openness and commitment to resolving the issue is important in ensuring they leave with a positive impression.
- » <u>Work out what you can legally release:</u> If there are legal issues, be aware of where the line is drawn on what you can say.
- » <u>Avoid speculation or answering hypothetical questions:</u> Stick to the facts and what did happen.
- » <u>Challenge information you know to be wrong:</u> Don't leave wrong facts out there. Let the media know the information is wrong and let other organisations know so they don't repeat it.
- » <u>Show concern:</u> Your main mission is to care/service/support the community so you need to be mindful of the feelings as well as the issues.
- » <u>Ban the words "no comment":</u> It sounds as though you know the answer but don't want to provide it.
- » <u>Don't run from the cameras:</u> The one piece of vision you are absolutely guaranteed to see on television that night is the vision of someone running from the media, or shielding their face, or slamming the door in their face.
- » <u>Consider bringing the media into your organisation:</u> Hold frequent media briefings rather than have reporters camped on the nature strip.
- » <u>Talk in common, easily understood language:</u> Speak in a manner that ensures people can actually understand the message you are trying to portray.

4.6   Style of media communications

The organisation may utilise print, digital, radio and television communications in liaising with the media.

All SPBA initiated print and digital media releases identify the organisation as the author and where possible include the following:
- » Organisation's logo
- » Organisation's goal(s)
- » Contact details
- » Reference to the organisation's website**.**

All media communications are:
- » Presented in Plain English.
- » Clearly define the issue, the organisation's views and what the organisation is seeking.
- » Provides clear explanations where acronyms and sector specific terminology is used.

Refer to the organisation's Media Release Template for further guidance. For more information on branding and language style, refer to the corporate image Section of this policy.

4.7   Record-keeping

An electronic copy of all media communications is saved in the OneDrive folder located on OneDrive/OfficeStaff/SPBA Communications/RecordKeeping.

Following any media release or communication, including print material and interviews, the General Manager, President and/or Media Co-ordinator will:

» Inform staff of the activity
» Provide a copy to be posted on the organisation's website
» Ensure that organisational publications include a brief statement of the activity in order to inform members and the broader community.

Feedback provided from members, stakeholders and the general community in regards to media releases or communications is to be forwarded to the organisation's General Manager or the person responsible for the activity.

The General Manager or responsible person will collate the feedback and inform staff and Board members, and where necessary respond to feedback.

SECTION 5:   MARKETING AND PROMOTION

SPBA is committed to accurate and relevant information about how its program, services and projects are disseminated and made available to members, stakeholders and the broader community in a clear and timely manner.

The purpose of this Section is to provide guidance on planning, developing and reviewing marketing and promotional strategies and how this material is distributed and promoted to ensure that organisational services, program and activities are accessed.

This Section ensures that the organisation's:
» Promotional materials meet the needs of members as well as the broader community
» Information is accessible and easily understood by people with diverse communication needs
» Information reflects the diversity of its operations
» Promotional material is visible and identifiable to members, stakeholders and the general community
» Information is spread through a variety of different communication channels, such as printed material and online data that is available
» Promotional activities are consistent and delivered appropriately
» Marketing and promotional material is consistent with the organisation's values, legal requirements, related policies, and codes of conduct.

5.1   Publications

The organisation uses different types of publications to deliver information to the public about services, programs, projects and research and other information. Publications may include:
» Organisational brochures
» Flyers, posters and fact sheets
» Newsletters
» Website information
» Photographic material.

When publishing documents, the organisation considers the following:
» Organisation's corporate image
» Copyright legislation
» Referencing and necessary bibliographic information
» Publication modalities and distribution paths.

For more details on the SPBA corporate image, refer to Corporate Image Section of this policy.

5.1.1   Copyright notice

Copyright protection starts when a work is first recorded, written down or made, although there are exceptions for unpublished photographs. Copyright protection is automatic: there is no registration requirement or other formality, and no fees are payable.

SPBA demonstrates copyright protection by including the copyright symbol and a copyright statement on all published materials. The copyright notice is to be placed on the reverse of the title page of printed publications and on the home page (or a linked page) of electronic documents.

The standard copyright notice is:

© SPBA [insert year] Australia.
This work is copyright. You may download, display, print and reproduce this material in unaltered form only (retaining this notice) for your personal, non-commercial use or use within your organisation. Requests for further authorisation should be directed to: General Manager, SPBA, PO Box 122 Dromana.

Contact details may also be placed on the reverse/last page of the publication following the copyright notice. Standard contact details are:

SPBA
PO Box 122, Dromana, Victoria
Telephone: **03 5981 0347**
Website: **www.sthpen.com.au**

5.1.2   Use of copyright material

All Board members, staff and volunteers of SPBA are required to observe all applicable copyright laws and regulations.

Staff and volunteers of SPBA may use copyright material belonging to or licensed to SPBA only for the purposes of their work for SPBA. Where the material is used by SPBA under licence, staff and volunteers must act in accordance with that licence.

Staff and volunteers of SPBA may not reproduce, publish, distribute or adapt third party copyright material in the course of their work for SPBA without the authorisation of the copyright owner. Staff and volunteers may not download or reproduce text, photographs or illustrations found on the internet without authorisation of the copyright owner. This includes for use in internal or external newsletters, reports or presentations.

All non-generic images and illustrations should be sourced from and with the consent of the creator. Generic images may be obtained from a stock image supplier (e.g. Shutterstock or iStockphoto).

When reproducing or otherwise using third party copyright material, it cannot be assumed that just because something is on the internet that it is free for everybody to copy and use. This includes images on Facebook or photo sharing websites such as Flickr. Acknowledgement of source of the material does not overcome the need for authorisation; actual authorisation is still required.

5.1.3   Reference style

The suggested format (Harvard Style) for both providing a reference for a SPBA publication or referencing an external document is:

> *[Insert author/organisation] [Insert year of publication]. [Insert title of publication]. [Insert publisher and place of publication].*

5.2   Website

The Media Co-ordinator is responsible for maintaining the organisation website. The website presents a comprehensive overview of the organisation and provides information on goals, services, programs, competitions, projects, news, publications and the public operation of the organisation.

The website has been developed and managed by WebAlive in co-ordination with the General Manager.

5.3   Organisational brochures

The Media Co-ordinator is responsible for developing and maintaining all organisational brochures which present summary information about SPBA and provide information on how to access services, competitions and programs of the organisation.

An electronic copy of all organisational brochures is saved in the [OneDrive/OfficeStaff/SPBA Communications/Promotional located on OneDrive.

5.3.1   General organisation brochure

Describes general goals and aims of the organisation, contact details and how to access/contact the organisation. The brochure also provides some the broad range of activities conducted by the organisation.

5.3.2   Program/ services brochure

Includes a brief overview of all programs and services provided. This brochure provides more in-depth and specific information about what services and programs are available, how the services/programs are structured, eligibility criteria, contact details and how to access/contact the organisation.

5.3.3   Feedback and complaints information sheet

The organisation values and utilises feedback for internal improvement processes. The Feedback and Complaints Information Sheet provides clear information of the processes to communicate and provide feedback to the organisation.

An electronic copy of the Feedback and Complaints Information Sheet brochure is saved in the OneDrive folder OneDrive/OfficeStaff/SPBACommunications.

For more information on feedback and complaint management, refer to the Feedback and Complaints Section of this policy.

5.4   Other publications

5.4.1   Newsletter

The **SharkAttack** newsletter is a primary tool for distributing outgoing information to the organisation's members, stakeholders and broader networks. The newsletter provides information on programs, projects, events, resources, relevant partnerships and new services.

The Community Engagement Officer holds responsibility for co-ordinating the production and distribution of the SharkAttack newsletter, with support provided by the General Manager. All staff members are responsible for actively contributing/writing articles and collating items of interest for the publication.

Items in the SharkAttack newsletter link to the organisation's website and other sources for more detail, if provided in an electronic format. Hard copies are printed and disseminated in a timely manner, as per the distribution list. For more information about the distribution list, refer to Section 5.5 of this policy.

SharkAtttack newsletter is developed and distributed every month via the MailChimp platform.

Copies of previous SharkAttack newsletters are available on the organisation's website on https://www.sthpen.com.au/newsletters/.

Newsletters are to be distributed via MailChimp or pdf.

5.4.2   Emails

Emails are the main tool for distributing outgoing information to stakeholders and broader networks. Emails provide simple and individual information on programs, projects, events and other organisational activities.

All attachments are to be sent in pdf or other non-editable formats.

To keep the names and e-mail addresses of people included in a distribution list private, or hidden, use the Bcc field.

For information on email formatting, refer to Section 3 of this policy.

5.5   Distribution
Any printed and online promotional material is distributed to relevant stakeholders.

5.5.1   Distribution list
The Media Co-ordinator is responsible for maintaining a communications distribution list of relevant organisations and their contact details, as well as ensuring they have adequate supplies of all the organisational promotional materials.

Online promotional material is uploaded to the organisation's website and distributed appropriately to networks as required.

5.5.2   Maintenance of contacts
The Media Co-ordinator is responsible for updating any information provided by organisations and informing other staff, Board members, students and volunteers of any significant change(s).

5.6   Advertising
The Media Co-ordinator manages all aspects of the organisation's advertising in all media, with the exception of staff recruitment and advertising. For information about recruitment and advertising of positions, refer to the Human Resources Policy.

5.6.1   Placing advertisements
All advertisements for SPBA brand, services, programs, projects and events are developed by the Media Co-ordinator and produced/designed by the Media Co-ordinator.

All advertisements are approved by the supervisor of the activity and the General Manager for editorial, brand and legal compliance.

5.6.2   Third-party advertising
Advertisements that are not paid for by the organisation that carry the SPBA logo, but which are published by and in conjunction with other community partners, are subject to approval by the General Manager in consultation with the supervisor managing the activity for which the logo it has been utilising.

This requirement should be appropriately negotiated with partner agencies and stipulated in any partnership or collaboration agreement. See the External Relationships section of the Organisational Development Policy.

5.6.3   Advertising by online channels
Advertising in online communications (for example, publications, website, and email) requires approval by the General Manager.

5.7 Record-keeping

A copy of all marketing and promotional material is saved in editable and non-editable formats in OneDrive/OfficeStaff/SPBACommunications and is managed by the Media Co-ordinator.

5.8 Feedback

All feedback received relating to marketing, promotion activities and publications is forwarded to the General Manager. Significant positive or negative feedback is managed and recorded as per Section 7 of this policy.

SECTION 6: SOCIAL MEDIA

Social media is an important way in which communication and business is undertaken with communities, members, staff members and other organisations.

The purpose of this Section is to provide guidance on using social media platforms as a practical instrument to improve participation, engage with the community and its stakeholders, enhance transparency and fully realise the organisation's goals and strategic outcomes.

SPBA's social media strategies and processes ensure that anyone using social media tools on behalf of the organisation produce communications that are of a consistently high quality, collaborative, appropriate, transparent and accountable. Social media tools also:
»   Are recognised as an integral part of the organisation's communication
»   Enable collaboration and engagement, both with the community and stakeholders
»   Support staff members in diversifying service delivery approaches
»   Support responsible and accountable practices.

This Section applies to all staff, members, volunteers and Board members.

This Section ensures that the organisation:
»   Uses social media platforms to share and promote access to information and services
»   Creates opportunities to listen to and engage with staff, the public and community
»   Supports a consistent and quality online experience
»   Uses social media in a manner that is consistent with the organisation's values, legal requirements, related policies, and codes of conduct.

This Section does not provide guidance on:
»   Social media policy implementation or training
»   Client's use of social media platforms
»   Staff, Board members' and volunteers' use of social media platforms

6.1   Social media background
For the purpose of this policy, social media is defined by a number of online tools or websites that engage, create and share user-generated content, data and comments that might impact on the organisation itself or the people who use the organisation's services.

Social media encompasses tools and programs that allow and promote any user to publish, discuss and share media content. These options include, but are not limited to:
»   Social and professional networking sites (examples: Facebook, LinkedIn, Instagram)
»   Video and photo sharing websites (examples: YouTube, Pinterest)
»   Weblogs, or 'blogs' – online diaries for pictures and updates (examples: Tumblr, Blogger, WordPress)
»   iTunes and podcasting

SPBA may benefit from using social media by:
»   Free advertising and web presence

» Presence in sector or topic discussions
» Engaging supporters, members and the broader community
» Developing open communication channels between the organisation and the general public.

6.2   Social media plan

As part of the organisational communication strategy, SPBA undertakes social media activities based on a structured Social Media Plan which clearly outlines the organisation's objectives, social media platforms, responsibilities, audience, content, delivery of content and outcomes, and allows for evaluation and the measurement of the impact of social media activities in the organisation.

The Social Media Plan and activities are managed by Media Co-ordinator and his/her responsibilities include:
» General administration and co-ordination of social media plan
» Delivering, managing and moderating content
» Monitoring use and organisational statistics
» Managing external comments and responses

In the absence of the Media Co-ordinator the General Manager is to manage social media priorities, or alternatively, delegate responsibilities to another staff member.

6.2.1   Goals

The organisation goals with its social media platforms include:
» Engaging with the community and target population
» Increasing numbers of followers or visits or enquiries about the organisation
» Increasing views of organisational events flyers
» Networking with partner organisations

6.2.2   Platforms

SPBA utilises the following platforms to communicate with members, stakeholders and the broader community.
» Website
» Facebook
» Instagram
» Twitter
» YouTube

Each social media platform is managed in a different way according to the platform requirements and features. SPBA social platforms operate as per below:

Facebook	
Audience	Members, potential members, supporters and those with an interest in basketball.
Description	

» **SPBA** » **Public page** » **Frequency:** Daily » **Type of content:** Promotional material for Association operations » **Evaluation methods:** reach per post, likes per post, number of shares and new.	

Instagram	
Audience	Members, potential members, supporters and those with an interest in basketball.
Description	
» **SPBA** » **Public page** » **Frequency:** Daily » **Type of content:** Promotional material for Association operations » **Evaluation methods:** reach per post, likes per post, number of shares and new.	

Twitter	
Audience	Broader public
Description	
» **SPBA** » **Public page** » **Frequency:** Special events and achievements » **Evaluation methods:** reach per post, likes per post, number of shares and new.	

YouTube	
Audience	Members and wider coaching community
Description	
» **SPBA** » **Type of video:** Educational & promotional video » **Frequency:** Fortnightly - Monthly » https://www.youtube.com/user/SPBASharksBasketball/about » **Evaluation methods:** TBC	

6.2.3 Content

SPBA engages members, stakeholders and the broader community by providing the following authorised content:

» Event promotion
» Positive organisation outcomes

» Positive comments about other organisation's achievements
» Organisational campaigns
» Fundraising activities
» Program, competition or operation changes or news

6.2.4 Content delivery
SPBA delivers social media content and responds to messages in a timely manner, establishing clear and frequent posting schedules to each social media platform, as per Section 6.2.3.

6.2.5 Evaluation
In order to continually improve the delivery of services, the organisation evaluates its social media presence by analysing the goals, online measuring tool and the tangible outcomes for the organisation. These include:

Social media goals	Online measuring tool	Organisational outcomes
Promote programs and events to existing members	» Number of followers » Organic reach	» Increased positive image in the community and increased engagement with our organisation.
Promote our services to potential new members or community stakeholders	» Shares of posts » Results of paid promotion	» Increased membership » Increased funding.
Increase exposure of our sponsors	» Engagement with sponsor posts » Retention of sponsorship » Growth of sponsorship	» Increased business for sponsors » Increased sponsor satisfaction

This supports the organisation in identifying:
» Unpopular social media platforms
» Possible changes or upgrade of the social media plan
» Content strengths and trends
» Trends and shifts in members', stakeholders' and community interactions.

6.3 Organisational identification
The organisation presence on social media platforms is defined by its online name, id, user name or organisational account name when using online or social media tools and programs.

SPBA official names and accounts include:

Platform	Official name

Facebook – Association	*SPBA*
Instagram – Association	*sthpenbball*
Twitter	*SthPenSharks*
YouTube	*SPBA*

6.3.1 Related brands

The organisation in some circumstances develops parallel social media accounts, pages, sites, and channels as link platforms to the official organisational accounts and names, in order to achieve individual program or project goals. These related social media platforms include:

Platform	Official name	Purpose
Facebook	Southern Peninsula Junior Tournament	Tournament specific communication
Instagram	sthpentournament	Tournament specific communication

Platform	Official name	Purpose
Facebook	SPBA Referee Supervisors	Communication between referee supervisors only
Facebook	SPBA Referees	To promote information across all referees at SPBA
Facebook	Southern Peninsula Tournament Referees	To promote tournament information to prospective tournament referees
Facebook	Southern Peninsula Senior Players	To communicate information to all current SPBA Senior Players
Facebook	Southern Peninsula Hoops Coaching Platform	Educational platform open publically
Facebook	Southern Peninsula Coaching Group (year)	Private group to communicate regarding VJBL coaching information.

6.4 Social media protocol

6.4.1 Official use

Official use is when a staff member or volunteer is using official and related social media platforms identified as a representative of SPBA with permission from the General Manager. Information provided in these messages/posts must:
» Comply with the SPBA code of conduct
» Follow organisational social media content restrictions
» Comply with any governing body codes of conduct.

6.4.2 Personal use

Personal use is when a staff member, Board member, student or volunteer is using social media platforms identified as themselves and not officially as a representative of SPBA although identifying themselves as affiliated with the organisation in their activity content. This could include photos, profile, current job, etc.

For further information on staff member, Board member or volunteer use of social media platforms while affiliated with SPBA refer to the Information and Communication Technology Policy.

6.4.3 Inappropriate use

Inappropriate use of official and related organisational social media platforms includes, but is not limited to:
» Conducting a private business on social media websites
» Using discriminatory, defamatory, abusive or otherwise objectionable language against people or organisations
» Stalking, bullying, trolling or marginalising any individual or group
» Uploading confidential information regarding the organisation's business
» Not following the organisational social media content restrictions.

It is the direct responsibility of staff members, Board members or volunteers to comply with the above guidelines and to advise the General Manager of any unauthorised activity.

Inappropriate or incorrect use of organisational social media platforms is considered serious misconduct, as it affects the organisation values, credibility and professionalism with its members, stakeholders and the broader community.

Engaging in any type of social media misconduct will be managed as per the Employee Handbook and/or Basketball Victoria Tribunal and may include disciplinary actions, or in some instances, dismissal.

Following any inappropriate use of social media platforms, the General Manager will consider:
» Risk assessment and corrective measures
» Corrective measures action plan and responsibilities
» Issuing a media release.

6.4.4 Authorised access

The General Manager & Media Co-ordinator are the only authorised staff members that manage social media platforms and passwords, unless they authorise/delegate other staff members to access social media tools.

6.4.5 Systems and security

All SPBA computer systems and facilities, including social media tools used by the organisation, follow due process in terms of user responsibilities, copyright, access, hacking, monitoring and security breaches.

The nature of social media platforms depends on self-regulated communication channels where all individuals are able to provide feedback, complaints and either positive or negative comments. In order to ensure that SPBA social media channels are responsible and useful to the broader community, the organisation makes sure that the following comments/posts or messages are described as inappropriate and are subsequently deleted:

» Offensive, abusive or discriminatory information or language
» Graphic (violent, offensive, etc.) content
» Illegal content
» Comments about identifiable members, staff members, Board members, student or volunteers.

After deleting inappropriate posts, the General Manager will contact the comment/post author to provide an explanation of why the comment/post has been removed and the necessary action(s) that need to be implemented for it to be reposted.

6.4.6 Feedback and complaints

The organisation does not delete any negative feedback or criticism and commits to acknowledging feedback as long as it is made respectfully and does not breach the conditions mentioned above.

When negative feedback is received through social media platforms, Media Co-ordinator will acknowledge the feedback by posting the following message:

> We regret that your experience with SPBA has not been positive and we would like to invite you to formally submit your comments using the details below:
> Email: gm@sthpen.com.au
> Phone: 03 5981 0347
>
> Alternatively, you can submit your comments to www.sthpen.com.au/feedback. Thank you very much for the time you have taken to pass on this information; we appreciate and value your comments.

Following this message Media Co-ordinator will consider:

» Contacting the user by private message and offering a solution or further help
» Agreeing on a solution as soon as possible
» Informing the General Manager of the outcome.

SPBA is committed to facilitating transparent and effective feedback and complaints management processes for members and stakeholders, to improve the quality of its products and services.

The purpose of this Section is to provide guidance to SPBA staff, Board members and volunteers in receiving, collating, resolving and responding to feedback, complaints and compliments about the organisation's staff, services and operations.

All SPBA staff, Board members and volunteers are given information about the complaints and feedback management process as part of their induction.

This Section does not provide guidance on:
» Employee performance management, internal grievances and complaints management – refer to the Human Resources Policy
» Grievances between Board members – refer to Governance Policy
» Project and event feedback processes – refer to the Organisation Development Policy.

The organisation:
» Recognises that members and stakeholders need avenues to give feedback or raise complaints with the organisation, and are entitled to have their concerns addressed in ways that ensure access and equity, timeliness, accountability and transparency.
» Acknowledges that any person or organisation accessing services and programs provided by the organisation, or those affected by its operations, has the right to provide feedback and/or make a complaint.
» Understands that complaint information may be sensitive in nature, respects the complainant's right to confidentiality, and will handle complaints in a fair, equitable and timely manner.
» Conveys the process for communicating feedback and complaints to all staff, Board members, volunteers, members and stakeholders.

This Section ensures that:
» Feedback, including complaints, is considered an important part of SPBA's operational and program planning and as part of its quality improvement program
» Responses to complaints and other feedback are delivered in a consistent and timely manner
» All staff and Board members are able to receive a complaint or other feedback
» The resolution of the complaint to the satisfaction of the complainant is a goal of the SPBA's complaints handling process.

7.1   Communication of feedback and complaints processes

7.1.1   Information and methods of communication
Information on feedback and complaints management processes will be made available to members and stakeholders through a range of mediums, including:

- » Organisation website
- » Information packs
- » Staff, Board members and volunteer induction processes
- » Feedback and Complaints Information Sheet

Information provided in the Feedback and Complaints Information Sheet includes:
- » How to provide feedback or complaints
- » How the organisation values and utilises feedback and complaints in review and planning activities
- » The feedback and complaints management processes, confidentiality and timelines
- » The process for pursuing the complaint through an external body, in the event that a satisfactory resolution of the complaint cannot be reached.

7.1.2   Promoting processes

The organisation promotes accessibility for feedback and complaint receipt by providing members and stakeholders the opportunity to use a range of mediums to register a complaint or feedback. Contact details for feedback and complaints should be promoted as:

Providing feedback to SPBA

Members and stakeholders are welcome to contact any SPBA staff member; alternatively, feedback can be submitted using the details below:

Email: **gm@sthpen.com.au**
Phone:**03 5981 0347**
Mail: Feedback
          PO Box 122
          Dromana, 3936
          Victoria

A SPBA Feedback and/or Complaint Form can be accessed online at www.sthpen.com.au. Alternatively, you can request a form using the contact details above.

The provision of feedback and/or complaints will not affect the service being provided to you.

All feedback, including telephone and the primary email gm@sthpen.com.au is directed to the General Manager, unless another staff member's name is provided.

7.2   Feedback management

7.2.1   Receiving feedback

Feedback can be accepted by any staff or Board member and may include:

» **Formal feedback:** primarily received through service/program and/or management processes. This may include feedback collated through feedback forms, surveys and evaluation processes. Feedback received in this way should be managed in accordance with the organisation Program Management Policy.

Formal feedback may also be received via phone, email or face-to-face meetings. This may be identified as formal feedback by the person submitting the information.

» **Informal feedback:** can be received through face-to-face conversation, telephone, email or letter by any staff member. Feedback should be acknowledged by the receiver and the appropriate response provided where required. Informal feedback can be valuable in organisational and program development, planning, and review.

» **Feedback regarding staff:** whether formal or informal, feedback is reported to the relevant staff member and their supervisor and discussed in supervision/professional development review where appropriate.

» **Feedback regarding services/programs:** formal and informal feedback about SPBA programs, services and activities is to be raised at the organisation's Board, staff or team meetings where relevant. Staff involved in the activity that has generated the feedback should be notified on receipt of that feedback.

» **Negative feedback or concerns:** Managing negative feedback appropriately is of great importance in promoting the organisation's reputation for valuing all feedback and will assist in reducing the likelihood of a complaint being lodged.

The staff member in receipt of the negative feedback or concern, will raise the issue with their direct supervisor and discuss a plan to respond or provide further resolution (as outlined in Section 7.2.2) if required.

» **Feedback received in a non-acceptable manner:** In some circumstances, feedback may be received where the person providing feedback is unprofessional, and their behaviour is inappropriate or abusive. Staff members in receipt of any feedback or complaints should retain a professional demeanour and handle the matter in line with the organisation's Code of Conduct. The staff member informs both their direct supervisor and the General Manager of the situation.

Further information about managing unreasonable behaviour, including unreasonable complainant conduct (UCC), is available in the Managing Unreasonable Complainant Conduct: Practice Manual available from the Commonwealth Ombudsman[2].

7.2.2 Responding to feedback

All feedback submitted to SPBA should be acknowledged appropriately and in a timely manner. The recipient of feedback acknowledges receipt of feedback within five working days. Depending on the nature of the feedback, other responses may include:

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[2] Commonwealth Ombudsman, Managing Unreasonable Complainant Conduct: Practice Manual, Canberra Australia, 2nd Edition, May 2012

- » Thanking the individual/service
- » Informing the individual/service of its value
- » Explaining how the information will be utilised (i.e. compliments may be used in annual reporting; constructive feedback or suggestions may assist in future planning or review activities).

In some cases, feedback (for example, suggestions) may require a further response or resolution. Staff members in receipt of the feedback will also provide guidance on the next steps in the process. This may include:
- » Timeframe for response
- » Request for preferred contact method
- » Name and contact details of the staff member who will be responding
- » Request for supporting information (when relevant)
- » Organisational follow-up actions (e.g. raise the suggestion/concern at the staff, Board or team meeting).

The level of response required is dependent on the assessment of the feedback provided, the method of receipt and any explicit or implicit requests for a response or resolution.

7.2.3   Recording feedback

When receiving feedback, staff members are required to complete a Feedback Record Form. This document records factual information that can be supported by evidence, or should note that the information is not yet substantiated.

The staff member in receipt of the feedback, or the identified staff member for handling the response or resolution of the feedback, is responsible for recording the feedback in the Feedback Register and notifying the General Manager or direct supervisor if required.

Feedback forms provided by members, stakeholders and the general public are communicated to the General Manager or direct supervisor and are filled out with the appropriate information.

Negative feedback about staff members is referred directly to the relevant supervisor, and when deemed appropriate, documented in the staff member's personnel file. Personnel files are stored in accordance with the Human Resources Policy.

7.2.4   Organisational feedback forms

- » **Feedback form**
  The organisation's feedback form is located at https://www.sthpen.com.au/feedback-form/.

  Feedback forms are available to members, stakeholders and the general public. These forms constitute physical evidence of feedback and should be saved.

  Information to be logged in the organisation feedback form includes:
  - o Date of feedback

- o Contact details, including name, phone and email
- o Preferred method of contact
- o Feedback topic (e.g. program activity, organisation communications)
- o Feedback content (brief description).

» **Feedback record form**
Feedback that is received in a non-written form should be lodged using the feedback form, however marked as someone lodging feedback on somebody's behalf. Feedback is recorded in the folder on the Cognito Forms software.

Information to be logged in the organisation feedback record form includes:
- o Date of receipt
- o Received by (staff member)
- o Method of receipt (e.g. phone, face-to-face)
- o Feedback topic (e.g. program activity, organisation communications)
- o Feedback content (brief description)
- o Supporting documents (where relevant list and hyperlink to evidence of feedback)
- o Response required
- o Follow-up and/or other comments.

» **Feedback register**
The organisation's feedback register is located on Cognito Forms with the name Feedback Form.
Information to be logged in the organisation's feedback register includes:
- o Date of receipt
- o Received by (staff member)
- o Name of feedback provider / service name
- o Method of receipt (e.g. phone, email)
- o Feedback topic (e.g. program activity, organisation communications)
- o Feedback description
- o Status.

7.3   Complaints management
The SPBA complaints management process follows the stages of complaint management recommended by the Commonwealth Ombudsman[3] as per below.

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[3]   Commonwealth Ombudsman, Better Practice Guide to Complaint Handling, Commonwealth Ombudsman, Canberra, Australia, 2009.

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        ┌─────────────────────────────────┐
        │  1. Receive and record complaint │
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        ┌─────────────────────────────────┐
        │      2. Acknowledgement          │
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        │        3. Assessment             │
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        │        4. Planning               │
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        │        5. Investigation          │
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        │      6. Response/Resolution      │
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        │        7. Follow-up              │
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        │  8. Review and consideration of  │
        │        systemic issues           │
        └─────────────────────────────────┘
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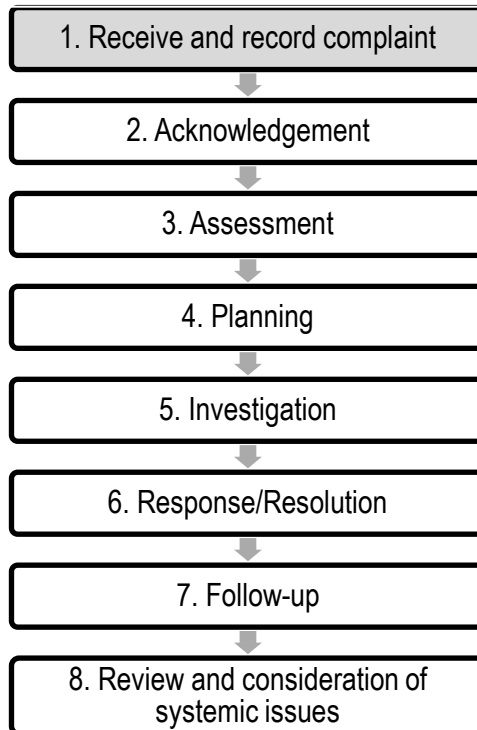
7.3.1   Receiving a complaint

A complaint may be received by any staff member via phone, email, letter, the organisation's Complaints Form or through a face-to-face meeting.

Where a staff member receives a complaint, complaint recipients are to complete the organisation's Complaints Record Form, attaching any additional information they deem is necessary to provide.

Complaints can be:

» **Formal complaints:** primarily received through written communication and may also be received via phone, email or face-to-face.

» **Informal complaints:** can be received through face-to-face conversation, telephone, email or letter to any staff member. Complaints should be acknowledged by the receiver and the appropriate response provided following the organisation's process outlined in this policy.

» **Complaints regarding services/programs:** formal and informal complaints about SPBA programs, services and activities are to be raised at the organisation's Board, staff or team meetings where relevant. Staff involved in the activity about which a complaint has been lodged should be notified on receipt of the complaint, if appropriate.

» **Complaints received in a non-acceptable manner:** complaints received in a non-acceptable manner should be managed in the same manner as feedback; see Section 7.2.1.

» **Complaints involving stakeholders and partners:** the organisation does not involve itself in complaints concerning stakeholders and partner agencies. SPBA does not have the power or mandate to formally resolve disputes between external parties. The organisation may, however, refer the complainant to the relevant party.

» **Complaints alleging criminal or fraudulent conduct:** allegations of fraudulent or criminal conduct should be raised directly with the General Manager and/or the President (excluding any individual implicated in the allegation) and subsequently reported to the police. The organisation will make itself available to assist the police with their investigation.

» **Complaints regarding staff members, volunteers, Board members and contractors:** whether formal or informal, these complaints are reported to the relevant staff member and their supervisor and discussed in supervision/professional development review where appropriate. The relevant staff member will co-ordinate a response to the complaint in conjunction with their direct supervisor. Complaints may include:

   o **Complaints involving managers/supervisors:** the General Manager will take on the role of the complaint handler.

   o **Complaints involving the General Manager:** should be referred to the organisation Board in line with the organisation's Governance Policy. The Board can nominate the President, the Executive or other Board members to manage the complaint with or without an independent mediator.

   o **Complaints involving Board members:** should be referred by the General Manager to the Board as a whole. The Board member will be given an opportunity to respond to the complaint in a one-on-one setting with an appointed Board member. The Board will manage the complaint collectively with the exclusion of the relevant Board member. The Board will keep the organisation's General Manager informed of the progress and outcome of the complaints process. Action taken arising from a complaint about a Board member or a member of a sub-committee will be taken in accordance with the organisation's Constitution and Governance Policy.

   o **Complaints involving contractors and/or consultants:** will be managed by the General Manager and/or the organisation's contact person for the contractor/consultant. In addition, to assist in resolving the matter, the complaints handler may wish to forward the complaint to the contractor/consultant's organisation.

   The contractor/consultant may not wish to engage in a formal complaint management process. However, the organisation will continue with the process to provide a response to the complainant in accordance with the principles of this policy.

Where a contractor/consultant does not engage in the complaints process or where a complaint outcome finds the contractor/consultant to be at fault, the organisation must determine if the contract between SPBA and the consultant/contractor should be terminated.

- **Complaints involving volunteers or students on placement** are dealt with by the volunteer's or student's supervisor in accordance with the processes identified in accordance with the organisation's Employee Handbook and/or Basketball Victoria Tribunal.

   Where either a volunteer or student on placement does not engage in the complaints management process, the allocated supervisor of either the volunteer or student should maintain the role of complaints handler, and ensure the resolution reached is to the satisfaction of the complainant.

7.3.2   Recording complaints

When receiving complaints, staff members are required to complete a Complaints Record Form. This document only records factual information that can be supported by evidence; alternatively, in those situations where this cannot be done, it is noted where the information has yet to be substantiated.

The General Manager will register all complaints in the organisation's Complaints Register. Complaints involving SPBA staff, Board members, volunteers and students will be managed as per Section 7.3.1. For more information, refer to the Member Protection Policy.

Complaints forms provided by members, stakeholders and the general public are communicated to the General Manager and are completed containing all relevant information.

For information required in the organisational complaints forms refer to Section 7.3.10.

7.3.3   Acknowledging a complaint

All complaints submitted to SPBA should be acknowledged appropriately and in a timely manner. The recipient of a complaint acknowledges receipt of the complaint within five working days. Dependent upon the nature of that complaint, other responses may include thanking the individual/service, or informing them of the value of the complaint.

In some cases, complaints may require a further response or resolution. The staff member in receipt of the complaint will also provide guidance on the next steps in the process. This may include:
» Complaint management process
» Timeframe for response
» Request for preferred contact method.

7.3.4 Assessing complaints

The level of response required is dependent upon the assessment of the complaint, the nature of the complaint, the method of receipt and any explicit or implicit requests for a response or resolution.

Comprehensive assessment of a complaint is critical for effective complaint management and will identify the following:

» If the complaint can be resolved at first contact
» If the complaint requires more information, mediation or an investigation
» The priority of the complaint
» Those staff members who have the appropriate training to deal with such complaints
» If the complaint will be subject to litigation.

Following the acknowledgment of a complaint, the General Manager will assess the information and appoint a complaint handler to respond to the complaint. The General Manager may consult with the complainant to agree on a resolution process. Once the complainant is pleased with the process, the General Manager will inform the relevant parties:

» Complaint handler (name and contact details of the staff member who will be responding)
» Organisational follow-up plan/actions as part of the complaint management process.

Complainants have the right to privacy and confidentiality, and matters should not be discussed with any other SPBA representatives other than the General Manager, President and the complaint handler.

7.3.5 Planning

Most complaints can be easily resolved; however, the assessment of the complaint will determine if further investigation is required.

The General Manager and the complaint handler are responsible for developing a plan that will define:

» What is to be investigated
» The steps involved in investigating the complaint and whether further information is required, either from the complainant or from another person or organisation
» An estimate of the time it will take to resolve the complaint
» The solution the complainant is seeking, whether the complainant's expectations are realistic or need to be managed, and other possible solutions
» Any special considerations that apply to the complaint – for example, if the complainant has asked for their identity to be withheld from others, or if there is sensitive or confidential information that needs to be safeguarded.[4]

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[4] Better Practice Guide to Complaint Handling, Commonwealth Ombudsman, Canberra, Australia, 2009.

7.3.6 Investigation

SPBA ensures that impartial, confidential, transparent and independent investigation processes are in place to resolve complaints and to provide tangible solutions for complainants. This means that the organisation's complaints processes:

» Seek objective solutions that are founded on evidence and facts
» Are private
» Provide special care to protect any identifying details
» Welcome the complainant's feedback, comments and involvement.

It is not always possible to resolve each complaint following an investigation process. In such cases the SPBA complaint handler will explore other alternatives and try to reach a settlement with the complainant.

Complaint respondents are provided with an opportunity to respond to any issues raised by the complainant, including providing relevant information and supporting documentation at the request of the complaint handler. The complaints handler may (where appropriate) involve the respondent in mediation with the complainant.

7.3.7 Response/resolution

Following the results of the investigation, the response to a complaint will be co-ordinated by the General Manager or the complaint handler. However, all staff may be involved in responding to a complaint either through communication with the complainant, reviewing documentation or implementing practice changes as a result of a complaint or feedback.

The response to a complaint concerning SPBA services, operations, publications, resources and staff members generally includes the following details and information:

» Complaint details and date of receipt
» Complaint handler contact details
» Investigation results
» Complaint process timeframe
» Privacy and confidentiality actions
» Outcomes
» Contact details to expedite any requests for further information.

Additional information, resolution and actions arising from complaints involving staff, Board members, volunteers and students are managed internally and confidentially as per the organisation's Member Protection Policy and Governance Policy.

Within two months of the complaint being resolved, the organisation will follow-up with the complainant to review their satisfaction with the actions taken.

In the case of SPBA implementing change to a process or system in response to a complaint, follow-up is undertaken on the organisation's management system, typically via audit, to ensure that the revised process (i.e. corrective action) is 'holding' and delivering the intended outcomes. For further information, see 7.3.9 below.

7.3.9   Review and considerations of systemic issues

SPBA understands that following a complaint process, the findings of the investigation or resolution may point to administrative or operational issues inside the organisation.

Feedback (both positive and negative) is to be considered in operational planning as well as implementation and review activities in the areas of governance, risk management, client services, project management and work health and safety.

The complaints register is regularly reviewed to inform service planning and continuous quality improvement processes.

In order to maintain quality services, the organisation ensures that the following mechanisms are in place to confirm that complaints processes are effective and regularly monitored:
» Evaluation and number of complaints about a particular matter
» Monitoring of increase in complaints
» Analysis of complaints characteristics
» Changes in organisation's operations following complaints
» Yearly reports.

Reports and findings of complaint management processes are discussed and reviewed by the General Manager, senior managers and the organisation's Board.

7.3.10 Organisational complaints forms

» **Complaint form**
  Is located at https://www.sthpen.com.au/complaint-form/. Complaint forms are available to members, stakeholders and the general public.

» **Complaint record form**
  Complaints that are received in a non-written form should be recorded using the complaint form, however marked as someone lodging a complaint on somebody's behalf. Complaints are recorded in the folder on the Cognito Forms software.

» **Complaints register**
  The organisation's complaints register is located and accessible to authorised users via https://www.cognitoforms.com/forms/complaintform/entries/1-all-entries.

SECTION 8: PRIVACY AND CONFIDENTIALITY

SPBA is committed to protecting the privacy and confidentiality of members, staff, Board members, volunteers and stakeholders in the way information is collected, stored and used.

The Privacy Act 1988 (Cth) (Privacy Act), Australian Privacy Principles (APP) and registered privacy codes govern the way in which we must manage personal information.

This policy provides guidance on how the organisation collects, uses, discloses and otherwise manages personal information and provides guidance on legal obligations and ethical expectations in relation to privacy and confidentiality.

In operating our business, SPBA collects and holds two types of information which are covered by this policy Section: personal and organisational information.

The organisation is committed to ensuring that information is used in an ethical and responsible manner and recognises the need to be consistent, cautious and thorough in the way that information about members, stakeholders, staff, Board members and volunteers is recorded, stored and managed. The Privacy Act sets out organisational obligations in relation to personal information. The same standards are applied to personal information held in relation to members, stakeholders, staff, Board Members and volunteers.

This Section ensures that:
» SPBA provides quality services in which information is collected, stored, used and disclosed in an appropriate manner complying with both legislative requirements and ethical obligations.
» All staff and Board members understand their privacy and confidentiality responsibilities in relation to personal and organisational information about SPBA, its members, staff and stakeholders. This understanding is demonstrated in all work practices.

8.1 Consideration of personal information privacy

8.1.1 Open and transparent
SPBA considers privacy of personal information, as defined by the Privacy Act, to ensure that the organisation protects and manages peoples' personal information in an open and transparent manner.

SPBA acknowledges the importance of treating other information (that is not personal information) in a confidential manner. However, we may share information with other involved individuals and organisations where it would be in the best interests of the members, or other individual, to do so (and provided it is lawful to do so).

8.1.2 Anonymity and pseudonymity
Wherever it is lawful and practicable, individuals will have the option of not identifying themselves, use a pseudonym or request that the organisation do not store any of their personal information. This option will not be possible when anonymity is impracticable or

prevents SPBA from dealing with individuals who have not identified themselves or who have used a pseudonym.

8.2 Collection of personal information

8.2.1 Purpose for collecting information

The personal information which SPBA collects, holds, uses and discloses will vary, depending on how individuals interact with the organisation programs and services. Generally, the organisation will collect, use and hold personal information if it is reasonably necessary for, or directly related to, the performance of our functions and activities, which may include but are not limited to, the following purposes:

» registrations of members
» performing staff members' functions, including work health and safety obligations
» recruiting and engaging staff and contractors
» undertaking compliance with legal obligations
» conducting organisational functions, operations and development activities
» researching and evaluating programs and activities
» investigating and responding to complaints about service provision or general operations
» auditing, investigating and responding to allegations of fraud
» making and dealing with referrals
» performing services and providing treatment and support to members
» community development activities and fundraising
» contract management; and
» managing and responding to correspondence, complaints and enquiries from individuals and organisations.

In order to manage the information in an open and transparent manner, as part of all registration processes, a privacy notice that encompasses these principles is provided, and includes the following:

» purpose of collecting information
» how information will be used
» what type of information may be transferred and under what circumstances it will be transferred
» limits to privacy of personal information
» how a client can make a complaint about the use of their personal information.

In some circumstances, members, stakeholders or the broader community provide personal information on an unsolicited basis. SPBA does not provide a privacy notice in these circumstances because the information is unsolicited. However, under APP4, the organisation is required to assess any unsolicited personal information received to determine whether it could have lawfully been collected under the Privacy Act. If so, it is then handled in compliance with the Privacy Act. If not, this personal information must be destroyed or de-identified.

8.2.2 How information is collected

SPBA collects personal information through a range of different channels, including:

» paper-based and electronic forms (including online forms)
» face-to-face meetings
» telephone and email communications
» organisation website and other linked websites
» social media websites and accounts.

There may be some instances where personal information will be collected indirectly because it is unreasonable or impractical to collect personal information directly from the individual. The individual will be notified about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

8.2.3   Types of personal information collected

SPBA may collect and hold personal information about an individual that can identify the individual, and is relevant to the contact with that individual (e.g. in the case of staff members, the information is relevant to employing that individual or, in the case of members, the information is relevant to providing an individual with services).

The kinds of information typically collected include name, address, contact number, email address and may also include the following:
records relating to staff members, payroll matters, recruitment, disciplinary and counselling matters for the organisation's staff, contractors and job applicants, including security clearances and police record checks

» records relating to work health and safety matters, including accident and injury records, compensation and rehabilitation case files
» applications, instruments of appointment, and other records relating to the performance of our administrative functions and activities
» correspondence, invoices, receipts and other records relating to goods and services supplied to, provided by or purchased by us
» records including Board members, membership lists, committees and sub-committees, reference and working groups
» distribution and mailing lists relating to the dissemination of organisational publications, reports, newsletters and other information of interest to members, stakeholders and the broader community
» documents relating to contracts, grants, funding agreements and other procurement processes
» reports and other records relating to internal and external audits, performance as an employee and allegations of fraud and compliance investigations
» documents relating to feedback and complaints
» member requests for access to documents held by the organisation.

8.2.4   Failure to provide information

If the personal information provided to us by an individual is incomplete or inaccurate, the organisation may be unable to provide that individual or someone else they know, with the services that they, are seeking.

8.2.5   Internet users

When an individual accesses the organisation's website, we may collect additional personal information about them in the form of their IP address and domain name.

8.2.5.1 Website cookies

The main purpose of cookies is to identify users and to prepare customised web pages for them. Cookies do not identify individuals, but they may link back to a database record about an individual. Cookies are used by SPBA to monitor usage of the website and to create a personal record of when an individual visits the organisation website, and what pages he/she views, so that the individual may be served more effectively in the future.

Our website may contain links to other websites. SPBA is not responsible for the privacy practices of linked websites, and linked websites are not subject to our privacy policies and procedures.

8.2.6. Holding personal information

Any personal information held is stored via electronic files in accordance with this policy and other internal policies.

8.3   Dealing with personal information

8.3.1   Use and disclosure

SPBA only uses personal information for the purpose(s) for which it was given, or for purposes which are directly related to one of the functions or activities of the organisation or reasonably related activities. Personal information may be provided to government agencies, other organisations or individuals only if:

»   the individual has consented to its disclosure
»   it is required or authorised by law.

8.3.2   Marketing and promotion

SPBA does not use or disclose any type of personal information for the purpose of direct marketing or promotion of the organisation without the consent of the individual.

The organisation may use personal information other than sensitive information only if the individual has consented to the use or disclosure of the information for that purpose.

Members, staff members, Board members and volunteers are asked to provide consent for this purpose when accessing or starting their involvement with the organisation.

8.4   Integrity of personal information

8.4.1   Data quality

SPBA takes steps to ensure that the personal information collected, used and disclosed is accurate, up-to-date, complete and relevant.

8.4.2 Data security

SPBA takes reasonable steps to protect the personal information held. These include steps against loss, interference, unauthorised access, use, modification or disclosure and other information misuse. These steps also comprise reasonable physical, technical and administrative security safeguards for electronic and hard copy records as identified in the following text.

Physical safeguards include:
» locking filing cabinets and unattended storage areas
» physically securing the areas in which the personal information is stored
» not storing personal information in public areas
» positioning computers so that they cannot be seen or accessed by unauthorised people or members of the public; and
» securely disposing of, destroying or de-identifying information that is no longer required by the organisation, including decommissioned laptops and mobile phones
» records are disposed of in line with SPBA records management policy.

Technical safeguards include:
» using passwords to restrict computer access, and requiring regular changes to passwords
» establishing different access levels so that not all staff can view all information
» ensuring information is transferred securely
» using electronic audit trails; and
» installing virus protection and firewall software.

Administrative safeguards include not only the existence of policies and procedures for guidance but also the implementation of training programs to ensure staff, Board members and volunteers are competent in this area.

8.5   Access to, and correction of, personal information

Individuals have a right of access to personal information under the Privacy Act and may request access to information held about them. Access will be provided unless there is a sound reason under the Privacy Act or other relevant law.

Situations in which access to information may be withheld include:
» where the provision of access may create a threat to the life or health of an individual
» access to information creates an unreasonable impact on the privacy of others
» the request is clearly frivolous or vexatious, or access to the information has been granted previously
» the information is relevant to existing or anticipated legal proceedings; or
» denial of access is required, either by legislation or law enforcement agencies.

Amendments may be made to personal information to ensure it is accurate, relevant, up-to-date, complete and not misleading, considering the purpose for which the information is collected and used. If a request to amend information does not meet the criteria, staff may refuse the request.

8.6 Collection, use and disclosure of confidential information

Other information held may be regarded as confidential, pertaining either to an individual or an organisation. The most important factor to consider when determining whether information is confidential is whether that information can be accessed by the general public.

Staff members are to refer to the General Manager before transferring or providing information to an external source if they are unsure if the information is sensitive or confidential to the organisation or members, staff and stakeholders.

8.6.1 Information obtained through employment

All staff, Board members and volunteers agree to adhere to the organisation's Code of Conducts when commencing employment, involvement or a placement. The Code of Conducts outlines the responsibilities in relation to the use of information obtained through employment/involvement/placement.

8.6.2 Staff information

The Employee Handbook details how the organisation handles staff records to manage privacy and confidentiality responsibilities, including the storage of and access to staff personnel files and the storage of information of any applicants who have unsuccessfully applied for a position within the organisation.

8.6.3 Stakeholder information

SPBA works with a variety of stakeholders, including private consultants, and may collect confidential or sensitive information about stakeholders as part of a working relationship. Staff members do not disclose information about stakeholders that is not already in the public domain without stakeholder consent.

The manner in which staff members manage stakeholder information will be clearly articulated in any contractual agreements that are entered into with a third party.

8.7 Complaints and Feedback

If you are a staff member and wish to make a complaint about a breach of the Privacy Act, Australian Privacy Principles or a privacy code that applies to the organisation, the matter should be raised with your direct supervisor. If this is not possible or appropriate, the delegations indicated in the Member Protection Policy in regard to grievance management should be followed. Staff members who are deemed to have breached privacy and confidentiality standards set out in this policy may be subject to disciplinary action.

If a member or stakeholder wishes to make a complaint about a breach of the Privacy Act, Australian Privacy Principles or a privacy code that applies to us, a complaint should be raised in line with the complaints policy in Section 7 of this policy.

8.8   SPBA Public Privacy Policy Statement

Commitment to Privacy

SPBA is committed to protecting privacy and confidentiality.

The Privacy Act 1988 (**Privacy Act**), Australian Privacy Principles (APPs) and registered privacy codes govern the way in which we must manage your personal information.

This policy sets out how we collect, use, disclose and otherwise manage personal information and provides guidance on our legal obligations and ethical expectations in relation to privacy and confidentiality.

Our privacy policy is designed to ensure that personal information is collected, stored, used and disclosed in an appropriate manner complying both with legislative requirements and ethical obligations. We take positive steps to ensure that all our personnel understand their privacy and confidentiality responsibilities in relation to personal and organisational information. This understanding is demonstrated in all work practices.

Consideration of personal information privacy

- **Open and transparent**

We have designed our business practices to ensure that we will collect, store, use and manage personal information in an open and transparent manner.

We also acknowledge the importance of treating other information (that is not personal information) in a confidential manner. However, we may share information with other involved individuals and organisations where it would be in the best interests of the member, or other individual, to do so (and provided it is lawful to do so).

- **Anonymity and pseudonymity**

Wherever it is lawful and practicable, we will give the option not to identify yourself, to use a pseudonym or to request that we do not store any of your personal information.

Collection of personal information

- **Purpose for collecting information**

The personal information which we collect, hold, use and disclose will vary depending on your interaction with us.

Generally, we will collect, use and hold your personal information if it is reasonably necessary for, or directly related to, the performance of our functions and activities. These functions and activities may include, but are not limited to, the following:
» performing staff members' duties, including work health and safety obligations
» recruiting and engaging staff and contractors
» providing a service to you or to someone you know
» providing you with information about our organisation

- » facilitating our internal business operations, including complying with legal obligations
- » conducting organisational functions, operations or development activities
- » researching and evaluating programs and activities
- » investigating and responding to complaints about our services or general operation
- » auditing, investigating and responding to allegations of fraud
- » contract management; and
- » managing and responding to correspondence and enquiries from individuals and organisations.

We collect all personal information in accordance with the Privacy Act and provide a privacy notice as per APP 5 when we solicit personal information.

- **How information is collected**

We collect personal information through a range of different channels, including:
- » paper-based and electronic forms (including online forms)
- » face-to-face meetings, interviews, assessments and counselling sessions
- » telephone and email communications
- » organisation website and other linked websites; and
- » social media websites and accounts.

There may be some instances where personal information about you will be collected indirectly; for example, from a family member. This may be because it is unreasonable or impractical to collect personal information directly from you at that time.

- **Types of personal information collected**

We may collect and hold personal information about you that can identify you, and is relevant to providing you with our services. The kinds of information we typically collect include name, address contact details, emergency contact and compliance information and may be contained in the documents such as:
- » records relating to work health and safety matters, including accident and injury records, compensation and rehabilitation case files;
- » applications, instruments of appointment, and other records relating to the performance of the administrative functions and activities
- » correspondence, invoices, receipts and other records relating to goods and services supplied to, provided by or purchased by us
- » distribution and mailing lists relating to the dissemination of organisational publications, reports, newsletters and other information of interest to our members, stakeholders and the broader community
- » documents relating to contracts, grants, funding agreements and other procurement processes; and
- » documents relating to feedback and complaints.

- **Failure to provide information**

If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you, or someone else you know, with the services you, or they, are seeking, or otherwise perform our business operations.

- **Internet users**

If you access our website, we may collect additional personal information about you in the form of your IP address and domain name.

- **Our website uses cookies**

The main purpose of cookies is to identify users and to prepare customised web pages for them. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what pages you view so that we may serve you more effectively.

Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites, and linked websites are not subject to our privacy policies and procedures.

Holding personal information

Any personal information we hold is stored on both electronic files and hard copy files in accordance with this policy and other internal policies.

Dealing with personal information

- **Use and disclosure**

We only use your personal information for the purpose(s) for which it was collected (as set out above), or for purposes where you would reasonably expect us to and which are related to one of the functions or activities of the organisation. Your personal information may be provided to government agencies, other organisations or individuals if:

» you have given us your consent to do so
» we are required or authorised by law to do so; or
» by providing the personal information we will prevent or mitigate a serious and imminent threat to somebody's life or health.

Marketing and promotion
We do generally use or disclose any type of personal information for the purpose of direct marketing or promotion of our organisation. Even if we do not usually use your personal information for direct marketing purposes, we may seek your consent to use it for that purpose from time to time.

Integrity of personal information

- **Data quality**
We take reasonable steps to ensure that information collected used and disclosed is accurate, up-to-date, complete and relevant, as outlined in the Privacy Act 1988.

- **Data security**

We take reasonable steps to protect the personal information held. This includes implementing physical, technical and administrative safeguards against loss, interference, unauthorised access, use, modification or disclosure and other information misuse. These steps also comprise reasonable physical, technical and administrative security safeguards for electronic and hard copy records.

Access to, and correction of, personal information

You have a right to access your personal information and upon request we will provide access unless the Privacy Act or any other relevant law permits or requires us to withhold access. If we refuse you access, we will provide you with a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons).
We may charge you a reasonable fee for providing access to your personal information (but not for making a request for access).

We will generally respond to a request to access or amend information within 30 days of receiving the request.

Amendments may be made to your personal information to ensure it is accurate, relevant, up-to-date, complete and not misleading, taking into account the purpose for which the information is collected and used. If a request to amend information does not meet the above criteria, we may refuse the request.

If we refuse your request for changes to personal information, you may submit a written statement about the requested changes which we will attach to the relevant record of personal information. We will provide you with a written notice that sets out our reasons for our refusal (unless it would be unreasonable to provide this information), including details of the mechanisms available to you to make a complaint.

We will respond to a request to access or amend personal information within a reasonable period.

Complaints and Feedback

If you wish to make a complaint about a breach of the Privacy Act, Australian Privacy Principles or a privacy code that applies to us, please contact us using the details provided below and we will take reasonable steps to investigate the complaint and respond to your complaint. If you are not happy with our response, you may send your complaint directly to the Australian Information Commissioner.

For more information on how to make a complaint, please see our Complaint and Feedback page at www.sthpen.com.au/feedback/

If you have any queries or concerns about our privacy policy or the way we handle your personal information, please contact our General Manager at:

Email address: gm@sthpen.com.au
Telephone: 03 5981 0347

SECTION 9:   INTERNAL REFERENCES

9.1   Supporting Documents

» <u>Organisation Communications Audit Te</u>mplate
» <u>Publications Subscription List</u>
» <u>Media Release Template</u>
» <u>Communications Distribution List</u>

Feedback and complaints
» <u>Feedback and Complaints Information Sheet</u>
» <u>Feedback Form</u>
» <u>Feedback Record Form</u>
» <u>Feedback Register</u>
» <u>Complaints Form</u>
» <u>Complaints Record Form</u>
» <u>Complaints Register</u>

Included in the Human Resources Policy
» <u>Code of Conduct</u>

9.2   Referenced Policies
» <u>Organisational Development Policy</u>
» <u>Information and Communication Technology Policy</u>
» <u>Client Clinical Management Policy</u>
» <u>Human Resources Policy</u>
» <u>Service and Program Operations Policy</u>
» <u>Program Management Policy</u>
» <u>Clinical Supervision Policy</u>
» <u>Governance Policy</u>

SECTION 10: EXTERNAL REFERENCES

10.1   Legislation
» Privacy Act 1988
» Australian Privacy Principles (APPs)
» NSW Privacy and Personal Information Protection Act 1998
» Federal Circuit Court of Australia (Consequential Amendments) Act 2013
» Privacy Amendment (Enhancing Privacy Protection) Act 2012

10.2   Resources
» The Australian Council on Healthcare Standards (ACHS), The ACHS EQuIP5 Guide Corporate Member Services: Accreditation, Standards, Guidelines. Sydney Australia; ACHS 2018.
» Commonwealth Ombudsman, Better Practice Guide to Complaint Handling, Commonwealth Ombudsman, Canberra, Australia, 2009.
» Department of Health NSW, Policy Directive: Complaints Management Policy, Department of Health NSW, North Sydney, Australia, 2006
» NSW Health, NSW Drug and Alcohol Clinical Supervision Guidelines, Department of Health, NSW, North Sydney, Australia, 2006
» Privacy Law Reform, Resources

10.3   Websites
» Social Change Media: articles on using the media
» The Plain English Campaign
» Health Care Complaints Commission
» Commonwealth Ombudsman
» Australian Government, Office of the Australian Information Commissioner
» Australian Privacy Law Reform Information
» Tasmanian Government
» Plain English Campaign, in NADA, Complex Needs Capable: A Practice Resource for Drug and Alcohol Services, 2013
» NADA, Complex Needs Capable: A Practice Resource for Drug and Alcohol Services, 2013

10.4   Others
» Lifeline, Social Media Policy, Lifeline November 2012
» Lifeline, Social Media and Website Policy, Lifeline 2017
» Lifeline Australia, Media Relations Policy, Lifeline 29/01/2017
» iTaNGO Project, Social Media Workshop, Infoxchange Australia 29/11/2011
» ImproveIT, Infoxchange Australia 2014