

Policy Statement

Member Access

Approved by: CEO
Issue Date: 10 December 2009

Background:

This policy supports the main [Privacy Policy](#)

Statement of policy:

General Principle of Access

In the course of conducting its normal business activities, Vision Super collects, records, maintains and uses personal information in relation to its members and beneficiaries. Any personal information, including sensitive information held in respect of a member or beneficiary can be accessed by that person on written request, subject to the following conditions:

Breaches of other individuals' privacy

Access to personal information will be denied where it might unreasonably impact on the privacy of other individuals. Where practicable, the identity of those other individuals will be withheld and access given.

Dangers to health and safety

Access to personal information may be denied where access might pose a serious and imminent threat to life or health of any individual. For example, where providing access to information about an individual's medical condition or personal relationships previously known to that individual might cause that individual to harm themselves or others.

Frivolous or vexatious requests

Access may be denied where the request is frivolous or vexatious in nature.

Deliberations of the Vision Super Board

Where personal information is presented to the Vision Super Board or a committee of the Board in the course of its deliberations, access will only be granted to:

- Information provided directly by the individual concerned
- Information contained in reports or opinions from independent experts or other third parties

Criminal or unlawful activity, legal prejudice

Access may be denied where:

- Providing access is unlawful or denying access is required by law,
- Providing access would prejudice investigation and prosecution of criminal or unlawful or seriously improper activity,
- Providing access would prejudice the detection, investigation or remedying of serious improper conduct
- Providing access would be likely to prejudice proceedings before a court or tribunal, or implementation of its orders,
- The information relates to legal proceedings between the Vision Super and the individual and that information could be legally withheld during those proceedings,
- An enforcement or national security body requests the Vision Super not to provide access on the basis that it would be likely to damage Australia's national security interests,
- Providing access might prejudice confidential negotiations between Vision Super and another party.

Denial of access by third party

- Personal information may be provided to Vision Super by a third party on the basis that access to that information by the individual concerned will be denied. Where this is the case, Vision Super may deny access providing that denial is in accordance with the National Privacy Principles.

Intermediaries, de-identification and selective access

Where access has been denied for any reason stated above, Vision Super will take reasonable steps to provide access by alternative means such as:

- Use of a mutually agreed intermediary
- De-identification of either individuals or organisations in the information requested
- Selective access or reproduction of documents to withhold only that information to which access is denied.

Corrections to personal information

Vision Super will act upon verified member feedback to correct any personal information which is inaccurate, out-of-date, irrelevant, incomplete, misleading or not related to the purpose for which the information was collected.

Where personal information consists of opinions of, or determinations by, independent experts, or statements of intent by or the exercise of an election by the member, that information will be taken as a record at the time it was provided, and will not, in normal circumstances, be subject to correction.

If a member/beneficiary and Vision Super disagree about whether information is accurate/complete/up-to-date/relevant/misleading/related to the purpose for which the information was collected, and the individual asks for his/her position to be noted, a note to that effect must be placed on the member record.

Format of request and access

Requests for access must be made in writing, setting out the full name of the individual seeking access, the information to be accessed, and the address for provision of documents.

Applications should be addressed to:

The Privacy Officer
Vision Super
PO Box 18041
Collins Street East
Melbourne Vic 8003

Access to documentary information will be provided as photocopies, and information held on computer systems will be reproduced in printed format.

Where access is denied, the individual will be notified in writing of the denial and the reason for such denial. Satisfactory proof of identity will be required prior to access being granted.

Charges for access

In most cases access will be provided free of charge, but Vision Super reserves the right to impose reasonable charges for provision of information either generally or on a case-by-case basis.

Approved by the Chief Executive Officer on 10 December 2009